FORM ADV

UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Prin	nary Business Name: CHARLES SCHW	/AB & CO., INC.		CRD Number: 539
Oth	er-Than-Annual Amendment - All Sec	tions		Rev. 10/202
10/	6/2023 3:26:59 PM			
WA			ssions may result in denial of y g periodic amendments. See Fo	our application, revocation of your registration, or criminal rm ADV General Instruction 4.
Iter	n 1 Identifying Information			
	•	•		ct you. If you are filing an <i>umbrella registration</i> , the information to assist you with filing an <i>umbrella registration</i> .
A.	Your full legal name (if you are a sole CHARLES SCHWAB & CO., INC.	proprietor, your last, firs	t, and middle names):	
B.	(1) Name under which you primarily of CHARLES SCHWAB & CO., INC.	onduct your advisory bus	iness, if different from Item 1.A	
	List on Section 1.B. of Schedule D any	additional names under w	hich you conduct your advisory l	business.
	(2) If you are using this Form ADV to	register more than one in	nvestment adviser under an <i>un</i>	abrella registration, check this box \square
	If you check this box, complete a Scheo	dule R for each relying adv	iser.	
C.	If this filing is reporting a change in you name change is of ☐ your legal name or ☐ your primary) or primary business name (Ite	em 1.B.(1)), enter the new name and specify whether the
D.	(1) If you are registered with the SEC(2) If you report to the SEC as an exe(3) If you have one or more Central I	empt reporting adviser, you	ur SEC file number:	
	CIK Number			
	87634			
	751448			
	1303982			
E.	(1) If you have a number ("CRD Numb	per") assigned by the FIN	RA's CRD system or by the IARI	D system, your <i>CRD</i> number: 5393
	If your firm does not have a CRD numb	per, skip this Item 1.E. Do	not provide the CRD number of (one of your officers, employees, or affiliates.
	(2) If you have additional CRD Number	ers, your additional <i>CRD</i> n	umbers:	
			No Information Filed	
F.	Principal Office and Place of Business			
	(1) Address (do not use a P.O. Box): Number and Street 1: 211 MAIN STREET		Number and Street 2:	
	City: SAN FRANCISCO	State: California	Country: United States	ZIP+4/Postal Code: 94105
	If this address is a private reside	nce, check this box:		
	you are applying for registration, o which you are applying for registra	or are registered, with one tion or with whom you are an exempt reporting advise	or more state securities authori e registered. If you are applying t	iness, at which you conduct investment advisory business. If ties, you must list all of your offices in the state or states to for SEC registration, if you are registered only with the SEC, or fices in terms of numbers of employees as of the end of your
	(2) Days of week that you normally on Monday - Friday Other:	conduct business at your	principal office and place of busin	ness:

Normal business hours at this location:

(3) Telephone number at this location:

8:00 A.M. - 5:00 P.M.

415-667-7000

		, and the second	pal office and place of busines.	s, at which you conduct investment advisory busines	s as of
G.	Mailing address, if differen	t from your <i>principal office and place</i>	of business address:		
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
	If this address is a private	e residence, check this box:			
Н.	If you are a sole proprieto	r, state your full residence address,	if different from your principa	al office and place of business address in Item 1.F.:	
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
I.	Do you have one or more v LinkedIn)?	websites or accounts on publicly ava	nilable social media platforms	s (including, but not limited to, Twitter, Facebook and	Yes No
	If a website address serves addresses for all of the othe available social media platfo	as a portal through which to access or er information. You may need to list m	other information you have pu nore than one portal address. ntent. Do not provide the indiv	icly available social media platforms on Section 1.1. of Sublished on the web, you may list the portal without list Do not provide the addresses of websites or accounts of idual electronic mail (e-mail) addresses of employees of	ting on publicly
J.		contact information of your Chief Co Compliance Officer, if you have one.	•	an <i>exempt reporting adviser</i> , you must provide the cor em 1.K. below.	ntact
	Name:		Other titles, if any:		
	Telephone number:		Facsimile number, if any:		
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
	Electronic mail (e-mail) ac	ddress, if Chief Compliance Officer ha	as one:		
		npany Act of 1940 that you advise fomber (if any):	• • •	you, a <i>related person</i> or an investment company regi officer services to you, provide the <i>person's</i> name an	
K.	• •	tact Person: If a person other than t may provide that information here.	the Chief Compliance Officer	is authorized to receive information and respond to	questions
	Name:		Titles:		
	Telephone number:		Facsimile number, if any:		
	Number and Street 1:		Number and Street 2:		
	City:	State:	Country:	ZIP+4/Postal Code:	
	Electronic mail (e-mail) ad	ddress, if contact person has one:			Yes No
L.	-	all of the books and records you are ur <i>principal office and place of busine</i> s	·	ion 204 of the Advisers Act, or similar state law,	© 0
	If "yes," complete Section 1	1.L. of Schedule D.			V. N
M.	Are you registered with a	foreign financial regulatory authority?			Yes No
	•	registered with a foreign financial region," complete Section 1.M. of Schedule		have an affiliate that is registered with a foreign financia	
N.	Are you a public reporting	company under Sections 12 or 15(d) of the Securities Exchange	Act of 1934?	Yes No
Ο.	Did you have \$1 billion or	more in assets on the last day of yo	ur most recent fiscal vear?		Yes No

	If yes, what is the approximate amoun-	t of your assets:			
	C \$1 billion to less than \$10 billion				
	S \$10 billion to less than \$50 billion				
	\$50 billion or more				
	For purposes of Item 1.O. only, "assets" the total assets shown on the balance sh			manage on behalf of clients. Determine your total asse	ets using
Р.	Provide your Legal Entity Identifier if you	ı have one:			
	A <i>legal entity identifier</i> is a unique numb <i>identifier</i> .	er that companies use t	o identify each other in the fi	nancial marketplace. You may not have a <i>legal entity</i>	
SECT	TION 1.B. Other Business Names				
			No Information Filed		
SECT	TION 1.F. Other Offices				
You		Section 1.F. for each loc	ation. If you are applying for	usiness, at which you conduct investment advisory but SEC registration, if you are registered only with the sers of employees).	
	mber and Street 1: 3 E LINCOLN DRIVE		Number and Street 2:		
City	<i>r</i> :	State:	Country:	ZIP+4/Postal Code:	
PHO	DENIX	Arizona	United States	85016-1215	
If th	nis address is a private residence, check	this box:			
	ephone Number: 0-435-4000	Facsimile Num	per, if any:		
	iser on the Uniform Branch Office Regist	•	•	s a branch office location for a broker-dealer or inves ch Number here:	stment
How 393	v many <i>employees</i> perform investment a	dvisory functions from t	his office location?		
	other business activities conducted at t 1) Broker-dealer (registered or unregist		ck all that apply)		
	2) Bank (including a separately identifia3) Insurance broker or agent	ble department or divisi	on of a bank)		
	4) Commodity pool operator or commod	lity trading advisor (whe	ether registered or exempt from	om registration)	
	5) Registered municipal advisor				
	6) Accountant or accounting firm7) Lawyer or law firm				
Des	scribe any other <i>investment-related</i> busin	ness activities conducted	from this office location:		
You		Section 1.F. for each loc	ation. If you are applying for	usiness, at which you conduct investment advisory but SEC registration, if you are registered only with the sers of employees).	
Nun	nber and Street 1:		Number and Street 2	:	
	EL CAMINO REAL	.	SUITE 100		
City	<i>'</i> :	State:	Country:	ZIP+4/Postal Code:	

If this address is a private residence, check this be	ох: 🗖								
Telephone Number: 650 614-2000	Facsimile Number 650 614-2010	r, if any:							
If this office location is also required to be register adviser on the Uniform Branch Office Registration 100672		•	y as a branch office location for a broker-dealer or invanch Number here:	estment/					
How many <i>employees</i> perform investment advisory 26	y functions from th	nis office location?							
Are other business activities conducted at this offi	ce location? (checl	k all that apply)							
(1) Broker-dealer (registered or unregistered)									
lacksquare (2) Bank (including a separately identifiable dep	(2) Bank (including a separately identifiable department or division of a bank)								
lacksquare (3) Insurance broker or agent	(3) Insurance broker or agent								
lacksquare (4) Commodity pool operator or commodity trac	ding advisor (whet	ther registered or exempt	from registration)						
\square (5) Registered municipal advisor									
lacksquare (6) Accountant or accounting firm									
(7) Lawyer or law firm									
Describe any other investment-related business ac	tivities conducted	from this office location:							
	1.F. for each loca	ition. If you are applying f	f business, at which you conduct investment advisory for SEC registration, if you are registered only with the others of employees).						
Number and Street 1: 150 S WACKER DRIVE		Number and Street 2:							
City:	State:	Country:	ZIP+4/Postal Code:						
CHICAGO	Illinois	United States	60606-4111						
If this address is a private residence, check this be	ох: 🗖								
Telephone Number:	Facsimile Numb	per, if any:							
312-456-6624	312-456-6622								
If this office location is also required to be register adviser on the Uniform Branch Office Registration 429090		•	y as a branch office location for a broker-dealer or invanch Number here:	estment/					
How many <i>employees</i> perform investment advisory 87	y functions from th	nis office location?							
Are other business activities conducted at this offi (1) Broker-dealer (registered or unregistered)	ce location? (checl	k all that apply)							
☐ (2) Bank (including a separately identifiable dep	partment or divisio	on of a bank)							
(3) Insurance broker or agent	out this it of arrisio	or a barney							
(4) Commodity pool operator or commodity trad	ding advisor (whet	ther registered or exempt	from registration)						
☐ (5) Registered municipal advisor	g :	. g . /	-3 /						
(6) Accountant or accounting firm									
(7) Lawyer or law firm									
Describe any other investment-related business ac	tivities conducted	from this office location:							

United States

94025-4875

California

MENLO PARK

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

16 CORPORATE PLAZA DRIVE			
City: NEWPORT BEACH	State: California	Country: United States	ZIP+4/Postal Code: 92660-7901
If this address is a private residence, che	eck this box:		
Telephone Number: 949-718-5108	Facsimile Numbe 949-760-0104	r, if any:	
If this office location is also required to badviser on the Uniform Branch Office Rec 100627	•	_	a branch office location for a broker-dealer or investment Number here:
How many <i>employees</i> perform investmer 26	nt advisory functions from t	his office location?	
Are other business activities conducted a		ck all that apply)	
(1) Broker-dealer (registered or unreg			
(2) Bank (including a separately ident	ifiable department or divisi	on of a bank)	
(3) Insurance broker or agent			
(4) Commodity pool operator or comm	nodity trading advisor (whe	ther registered or exempt fron	n registration)
(5) Registered municipal advisor			
(6) Accountant or accounting firm			
(7) Lawyer or law firm			
Describe any other <i>investment-related</i> bu	usiness activities conducted	I from this office location:	
	D Section 1.F. for each local	ation. If you are applying for S	siness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or s of <i>employees</i>).
Number and Street 1: 100 POST STREET		Number and Street 2:	
City:	State:	Country:	ZIP+4/Postal Code:
SAN FRANCISCO	California	United States	94108-4702
If this address is a private residence, che	eck this box:		
Telephone Number: 415-667-6210	Facsimile Numbe 415-956-2770	r, if any:	
413 007 0210	413 730 2770		
If this office location is also required to badviser on the Uniform Branch Office Rec 100638	•	_	a branch office location for a broker-dealer or investment Number here:
How many <i>employees</i> perform investmer 36	nt advisory functions from t	his office location?	
Are other business activities conducted a		ck all that apply)	
☑ (1) Broker-dealer (registered or unreg ☐ (2) Bank (including a separately ident	,	on of a hank)	
(2) Bank (including a separately identification) (3) Insurance broker or agent	inable departifient of divisi	on or a pank)	
(3) Insulance broker of agent (4) Commodity pool operator or comm	andity trading advisor (who	ther registered or exempt from	m registration)
(4) Commodity pool operator or comm	iounty trading advisor (WHE	iner registered of exempt 1101	n registration)
(6) Accountant or accounting firm			
(6) Accountant of accounting firm			
_ (., _2, 5. 5. 12 11.111			
Describe any other <i>investment-related</i> bu	usiness activities conducted	I from this office location:	

Number and Street 2:

Number and Street 1:

Complete the following information for each office, other than your <i>principal office and place of business</i> , at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an <i>exempt reporting adviser</i> , list only the largest twenty-five offices (in terms of numbers of <i>employees</i>).						
Number and Street 1: 19100 RIDGEWOOD PARKWAY		Number and Street 2: 10TH FLOOR				
City: SAN ANTONIO	State: Texas	Country: United States	ZIP+4/Postal Code: 78259-1834			
If this address is a private residence, check this box:	: □					
Telephone Number: 800-435-4000	Facsimile Numbe	r, if any:				
·	If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here: 738203					
How many <i>employees</i> perform investment advisory for 113	unctions from this o	office location?				
Are other business activities conducted at this office (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable departion) (3) Insurance broker or agent (4) Commodity pool operator or commodity tradint (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm Describe any other investment-related business activities	rtment or division o	of a bank) registered or exempt fr	om registration)			
,	.F. for each location	n. If you are applying for	usiness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or			
Number and Street 1:		Number and Street 2:	ers or employees).			
12802 TAMPA OAKS BLVD		STE 202				
City: TEMPLE TERRACE		Country: United States	ZIP+4/Postal Code: 33637-1920			
If this address is a private residence, check this box:						
Telephone Number: 800-435-4000	Facsimile Number,	if any:				
If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here: 738200						
How many <i>employees</i> perform investment advisory functions from this office location? 51						
Are other business activities conducted at this office ✓ (1) Broker-dealer (registered or unregistered) ✓ (2) Bank (including a separately identifiable depar ✓ (3) Insurance broker or agent ✓ (4) Commodity pool operator or commodity tradin ✓ (5) Registered municipal advisor ✓ (6) Accountant or accounting firm	rtment or division o	of a bank)	om registration)			
(7) Lawyer or law firm						

Describe any other investment-related business a	activities conducted fr	rom this office location:						
	•		siness, at which you conduct investment advisory business.					
	ou must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or you are an exempt reporting adviser, list only the largest twenty-five offices (in terms of numbers of employees).							
Number and Street 1: 525 WASHINGTON BLVD.		Number and Street	2:					
City: JERSEY CITY	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07310					
If this address is a private residence, check this	box:							
Telephone Number: 800-726-3206	Facsimile Number, if	any:						
	If this office location is also required to be registered with FINRA or a state securities authority as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the CRD Branch Number here: 125217							
How many <i>employees</i> perform investment adviso 14	ry functions from this	s office location?						
Are other business activities conducted at this of	epartment or division	of a bank)	m registration)					
Describe any other investment-related business a	activities conducted fr	rom this office location:						
	on 1.F. for each location	on. If you are applying for S	siness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or or of employees).					
Number and Street 1: 1958 SUMMIT PARK DR		Number and Street 2:						
City: ORLANDO	State: Florida	Country: United States	ZIP+4/Postal Code: 32810-5952					
If this address is a private residence, check this	box:							
Telephone Number: 800-435-4000	Facsimile Number	r, if any:						
	If this office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here: 408642							
How many <i>employees</i> perform investment adviso 76	ry functions from this	s office location?						
Are other business activities conducted at this of ✓ (1) Broker-dealer (registered or unregistered) ✓ (2) Bank (including a separately identifiable de ✓ (3) Insurance broker or agent								

(5) Registered municipal advisor	commounty trading advisor (wir	ether registered or exempt in	on registration)
(6) Accountant or accounting firm	1		
(7) Lawyer or law firm	'		
Describe any other investment-relati	ted business activities conducte	d from this office location:	
	edule D Section 1.F. for each lo	cation. If you are applying for	usiness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or ers of <i>employees</i>).
Number and Street 1: 9899 SCHWAB WAY		Number and Street 2 SUITE 100	:
City: LONE TREE	State: Colorado	Country: United States	ZIP+4/Postal Code: 80124-5377
If this address is a private residence	e, check this box: $lacksquare$		
Telephone Number: 720-895-3400	Facsimile Numb 720-895-9908	er, if any:	
If this office location is also required adviser on the Uniform Branch Offic 561355	•		ns a branch office location for a broker-dealer or investment ch Number here:
How many <i>employees</i> perform inves	stment advisory functions from	this office location?	
Are other business activities conductors (1) Broker-dealer (registered or □ (2) Bank (including a separately	unregistered)	,, -	
(3) Insurance broker or agent (4) Commodity pool operator or (5)	commodity trading advisor (wh	ether registered or exempt fro	om registration)
(5) Registered municipal advisor			
(6) Accountant or accounting firm	1		
(7) Lawyer or law firm			
Describe any other investment-relation	ted business activities conducte	d from this office location:	
			usiness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or
if you are an exempt reporting advis			
Number and Street 1: 3000 SCHWAB WAY		Number and Street 2:	
City: WESTLAKE	State: Texas	Country: United States	ZIP+4/Postal Code: 76262-8104
If this address is a private residence	e, check this box:		
Telephone Number: 800-435-4000	Facsimile Nur	nber, if any:	
If this office location is also required adviser on the Uniform Branch Office 727412			as a branch office location for a broker-dealer or investment ch Number here:
How many <i>employees</i> perform inves	stment advisory functions from	this office location?	

Are other business activities conducted at this	s office location? (che	eck all that apply)		
$lackbox{\overline}$ (1) Broker-dealer (registered or unregister	ed)			
\square (2) Bank (including a separately identifiable	e department or divis	ion of a bank)		
\square (3) Insurance broker or agent				
\square (4) Commodity pool operator or commodity	y trading advisor (wh	ether registered or exempt fro	om registration)	
\square (5) Registered municipal advisor				
\square (6) Accountant or accounting firm				
\square (7) Lawyer or law firm				
Describe any other <i>investment-related</i> busine	ss activities conducte	d from this office location:		
	ction 1.F. for each lo	cation. If you are applying for	usiness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, ers of <i>employees</i>).	
Number and Street 1:		Number and Stree	et 2:	
8332 WOODFIELD CROSSING BLVD				
City: INDIANAPOLIS	State: Indiana	Country: United States	ZIP+4/Postal Code: 46240-2482	
If this address is a private residence, check the	nis box:			
Telephone Number: 800-435-4000	Facsimile l	Number, if any:		
If this office location is also required to be regadviser on the Uniform Branch Office Registra 456461		•	s a branch office location for a broker-dealer or investme ch Number here:	nt
How many <i>employees</i> perform investment adv	visory functions from	this office location?		
Are other business activities conducted at this ✓ (1) Broker-dealer (registered or unregister		eck all that apply)		
☐ (2) Bank (including a separately identifiable	e department or divis	ion of a bank)		
(3) Insurance broker or agent	·	,		
(4) Commodity pool operator or commodity	y trading advisor (wh	ether registered or exempt fro	om registration)	
(5) Registered municipal advisor			<i>,</i>	
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related busine	ss activities conducte	d from this office location:		
	ction 1.F. for each lo	cation. If you are applying for	usiness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, ers of <i>employees</i>).	
Number and Street 1: 4750 E FRANCISCO		Number and Street 2:		
City:	State:	Country:	ZIP+4/Postal Code:	
PHOENIX	Arizona	United States	85044-5365	
If this address is a private residence, check the	nis box: 🗖			
Telephone Number: 800-435-4000	Facsimile Num	ber, if any:		
If this office location is also required to be required to be required on the Uniform Branch Office Registra			s a branch office location for a broker-dealer or investme ch Number here:	nt

How many <i>employees</i> perform investment advised 26	sory functions from	this office location?		
Are other business activities conducted at this (1) Broker-dealer (registered or unregistere (2) Bank (including a separately identifiable (3) Insurance broker or agent (4) Commodity pool operator or commodity (5) Registered municipal advisor (6) Accountant or accounting firm (7) Lawyer or law firm	d) department or divis trading advisor (wh	sion of a bank) nether registered or exempt	from registration)	
Complete the following information for each off You must complete a separate Schedule D Sectif you are an exempt reporting adviser, list only	tion 1.F. for each lo	cation. If you are applying f	or SEC registration, if you are regis	•
Number and Street 1: 4150 KINROSS LAKES PKWY		Number and Street 2:		
City: RICHFIELD	State: Ohio	Country: United States	ZIP+4/Postal Code: 44286-9369	
If this address is a private residence, check thi	s box:			
Telephone Number: 800-435-4000	Facsimile Nur	mber, if any:		
If this office location is also required to be regi adviser on the Uniform Branch Office Registrati 429109		-		roker-dealer or investment
How many <i>employees</i> perform investment advises 92	sory functions from	this office location?		
Are other business activities conducted at this ✓ (1) Broker-dealer (registered or unregistere — (2) Bank (including a separately identifiable — (3) Insurance broker or agent	d)			
(4) Commodity pool operator or commodity (5) Registered municipal advisor	trading advisor (wh	nether registered or exempt	from registration)	
(6) Accountant or accounting firm				
(7) Lawyer or law firm				
Describe any other investment-related business	s activities conducte	ed from this office location:		
Complete the following information for each off You must complete a separate Schedule D Secilif you are an exempt reporting adviser, list only	tion 1.F. for each lo	cation. If you are applying f	or SEC registration, if you are regis	•
Number and Street 1: 11100 NE 8TH STREET		Number and Str SUITE 250	reet 2:	
City: BELLEVUE	State: Washington	Country: United States	ZIP+4/Postal Code 98004-4465	e:
If this address is a private residence, check thi	s box:			
Telephone Number: 425-709-7501	Facsimile Number 425-451-7215	r, if any:		

	his office location is also required to be registered with FINRA or a <i>state securities authority</i> as a branch office location for a broker-dealer or investment viser on the Uniform Branch Office Registration Form (Form BR), please provide the <i>CRD</i> Branch Number here:							
How many <i>employees</i> perform investment advisory 36	y functions from this	s office location?						
Are other business activities conducted at this offi ✓ (1) Broker-dealer (registered or unregistered)	ice location? (check	all that apply)						
(1) Broker-dealer (registered of diffegistered) (2) Bank (including a separately identifiable dep	nartmant ar division	of a bank)						
	partment or division	or a parik)						
(3) Insurance broker or agent								
☐ (4) Commodity pool operator or commodity tran☐ (5) Registered municipal advisor	ding advisor (wheth	er registered or exempt from	registration)					
(6) Accountant or accounting firm								
(7) Lawyer or law firm								
, ,								
Describe any other investment-related business ac	ctivities conducted fr	rom this office location:						
,	n 1.F. for each locati	on. If you are applying for S	iness, at which you conduct investment advisory business. EC registration, if you are registered only with the SEC, or sof <i>employees</i>).					
Number and Street 1: 9800 SCHWAB WAY		Number and Street 2:						
City:	State:	Country:	ZIP+4/Postal Code:					
LONE TREE	Colorado	United States	80124-5377					
If this address is a private residence, check this b	ox: 🗖							
Telephone Number: 800-435-4000	Facsimile Number,	if any:						
If this office location is also required to be registe adviser on the Uniform Branch Office Registration 571934		· ·	a branch office location for a broker-dealer or investment Number here:					
How many <i>employees</i> perform investment advisory 487	y functions from this	s office location?						
Are other business activities conducted at this offi ✓ (1) Broker-dealer (registered or unregistered)	ice location? (check	all that apply)						
\square (2) Bank (including a separately identifiable dep	partment or division	of a bank)						
(3) Insurance broker or agent								
(4) Commodity pool operator or commodity tra-	ding advisor (wheth	er registered or exempt from	registration)					
(5) Registered municipal advisor								
(6) Accountant or accounting firm								
(7) Lawyer or law firm								
Describe any other investment-related business ac	ctivities conducted fr	rom this office location:						
	n 1.F. for each locati	on. If you are applying for S	iness, at which you conduct investment advisory business. EC registration, if you are registered only with the SEC, or s of employees).					
Number and Street 1: 200 SOUTH 108TH AVE.		Number and Street 2:						
City:	State:	Country:	ZIP+4/Postal Code:					

If this address is a private residence, check this b	ox: 🗖							
Telephone Number: 402-970-7509	Facsimile Number	r, if any:						
If this office location is also required to be registe adviser on the Uniform Branch Office Registration 778164				r or investment				
How many <i>employees</i> perform investment advisor 172	ow many <i>employees</i> perform investment advisory functions from this office location?							
re other business activities conducted at this office location? (check all that apply) (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable department or division of a bank) (3) Insurance broker or agent (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)								
(4) Commodity pool operator of commodity tra	aing advisor (whe	ther registered or exempt in	om registration)					
(6) Accountant or accounting firm								
(7) Lawyer or law firm								
Describe any other investment-related business ad	tivities conducted:	I from this office location:						
Complete the following information for each office You must complete a separate Schedule D Section if you are an <i>exempt reporting adviser</i> , list only the	n 1.F. for each loca	ation. If you are applying for	SEC registration, if you are registered only	•				
Number and Street 1: 3000 TD AMERITRADE LANE		Number and Street 2:						
City: SOUTHLAKE	State: Texas	Country: United States	ZIP+4/Postal Code: 76092-4804					
If this address is a private residence, check this b	ох: П							
Telephone Number: 800-669-3900	Facsimile Num	ber, if any:						
If this office location is also required to be registe adviser on the Uniform Branch Office Registration 778156		•		r or investment				
How many <i>employees</i> perform investment advisor 156	y functions from t	his office location?						
Are other business activities conducted at this offi ✓ (1) Broker-dealer (registered or unregistered)	ce location? (chec	ck all that apply)						
(2) Bank (including a separately identifiable de	partment or division	on of a bank)						
(3) Insurance broker or agent								
☐ (4) Commodity pool operator or commodity tra☐ (5) Registered municipal advisor	ding advisor (whe	ither registered or exempt tro	om registration)					
(6) Accountant or accounting firm								
(7) Lawyer or law firm								
Describe any other investment-related business ad	ctivities conducted	I from this office location:						
Complete the following information for each office You must complete a separate Schedule D Section if you are an exempt reporting adviser, list only the	n 1.F. for each loca	ation. If you are applying for	SEC registration, if you are registered only	•				

Number and Street 2:

Number and Street 1:

11800 SCHWAB WAY			
City: AUSTIN	State: Texas	Country: United States	ZIP+4/Postal Code: 78758-4679
If this address is a private residence, check this k	рох:		
Telephone Number: 800-435-4000	Facsimile N	umber, if any:	
If this office location is also required to be registed adviser on the Uniform Branch Office Registration 644494			y as a branch office location for a broker-dealer or investment anch Number here:
How many <i>employees</i> perform investment advisor 147	ry functions fror	n this office location?	
Are other business activities conducted at this off	fice location? (c	heck all that apply)	
 (1) Broker-dealer (registered or unregistered) (2) Bank (including a separately identifiable de (3) Insurance broker or agent 	epartment or div	rision of a bank)	
☐ (4) Commodity pool operator or commodity tra ☐ (5) Registered municipal advisor ☐ (6) Accountant or accounting firm	ading advisor (w	hether registered or exempt	from registration)
(7) Lawyer or law firm Describe any other <i>investment-related</i> business a	ctivities conduc	ted from this office location:	
	n 1.F. for each	ocation. If you are applying f	<i>business</i> , at which you conduct investment advisory business. for SEC registration, if you are registered only with the SEC, or others of <i>employees</i>).
Number and Street 1: 8040 SOUTH 48TH STREET		Number and Street 2	: :
City: PHOENIX	State: Arizona	Country: United States	ZIP+4/Postal Code: 85044-5306
If this address is a private residence, check this k	рох:		
Telephone Number: 800-435-4000	Facsimile Nu	mber, if any:	
If this office location is also required to be registed adviser on the Uniform Branch Office Registration 681569			y as a branch office location for a broker-dealer or investment anch Number here:
How many <i>employees</i> perform investment advisor 56	ry functions fror	n this office location?	
Are other business activities conducted at this off (1) Broker-dealer (registered or unregistered)	fice location? (c	neck all that apply)	
(2) Bank (including a separately identifiable de(3) Insurance broker or agent	epartment or div	rision of a bank)	
(4) Commodity pool operator or commodity tra (5) Registered municipal advisor	ading advisor (w	hether registered or exempt	from registration)
☐ (6) Accountant or accounting firm ☐ (7) Lawyer or law firm			
Describe any other investment-related business a	ctivities conduc	ted from this office location:	

if you are an exempt reporting adviser, list only	3		or employees).
Number and Street 1:		Number and Street 2:	
5010 WATERIDGE VISTA DRIVE			
City:	State:	Country:	ZIP+4/Postal Code:
SAN DIEGO	California	United States	92121-5775
If this address is a private residence, check this	s box:		
Telephone Number: (800) 934-4448	Facsimile Number,	, if any:	
If this office location is also required to be registrational adviser on the Uniform Branch Office Registration 778148			branch office location for a broker-dealer or investment lumber here:
How many <i>employees</i> perform investment advis 36	sory functions from th	is office location?	
Are other business activities conducted at this	d)		
(2) Bank (including a separately identifiable	department or division	n of a bank)	
(3) Insurance broker or agent			
(4) Commodity pool operator or commodity	trading advisor (wheti	ner registered or exempt from	registration)
☐ (5) Registered municipal advisor☐ (6) Accountant or accounting firm			
(6) Accounting firm			
(7) Lawyer or law IIIII			
Describe any other investment-related business	activities conducted	from this office location:	
	ion 1.F. for each locat	tion. If you are applying for SEG	ess, at which you conduct investment advisory business. C registration, if you are registered only with the SEC, or of employees).
You must complete a separate Schedule D Sect	ion 1.F. for each locat	tion. If you are applying for SEG	C registration, if you are registered only with the SEC, or of <i>employees</i>).
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST	ion 1.F. for each locat	tion. If you are applying for SEO e offices (in terms of numbers of Number and Street 2	C registration, if you are registered only with the SEC, or of <i>employees</i>).
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1:	ion 1.F. for each local the largest twenty-fiv	tion. If you are applying for SEC e offices (in terms of numbers o	C registration, if you are registered only with the SEC, or of employees).
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City:	ion 1.F. for each local the largest twenty-fiv State: Washington	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country:	C registration, if you are registered only with the SEC, or of <i>employees</i>). ZIP+4/Postal Code:
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City: SEATTLE If this address is a private residence, check this	ion 1.F. for each local the largest twenty-five state: Washington s box:	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country: United States	C registration, if you are registered only with the SEC, or of <i>employees</i>). ZIP+4/Postal Code:
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City: SEATTLE If this address is a private residence, check this Telephone Number:	ion 1.F. for each local the largest twenty-fiv State: Washington	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country: United States	C registration, if you are registered only with the SEC, or of <i>employees</i>). ZIP+4/Postal Code:
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City: SEATTLE If this address is a private residence, check this Telephone Number: 98101-2309	ion 1.F. for each local the largest twenty-five state: Washington Facsimile Number, if 206-287-3810	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country: United States f any:	C registration, if you are registered only with the SEC, or of <i>employees</i>). ZIP+4/Postal Code: 98101-2309 branch office location for a broker-dealer or investment
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City: SEATTLE If this address is a private residence, check this Telephone Number: 98101-2309 If this office location is also required to be regisadviser on the Uniform Branch Office Registration.	state: Washington Facsimile Number, if 206-287-3810 Stered with FINRA or a con Form (Form BR), p	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country: United States f any: a state securities authority as a blease provide the CRD Branch N	C registration, if you are registered only with the SEC, or of <i>employees</i>). ZIP+4/Postal Code: 98101-2309 branch office location for a broker-dealer or investment
You must complete a separate Schedule D Sect if you are an exempt reporting adviser, list only Number and Street 1: 508 UNION ST City: SEATTLE If this address is a private residence, check this Telephone Number: 98101-2309 If this office location is also required to be regisadviser on the Uniform Branch Office Registration 100626 How many employees perform investment adviser.	state: Washington Facsimile Number, if 206-287-3810 Stered with FINRA or a con Form (Form BR), person of the control of the	tion. If you are applying for SEC e offices (in terms of numbers of Number and Street 2 Country: United States f any: a state securities authority as a alease provide the CRD Branch Notes is office location? c all that apply) n of a bank)	C registration, if you are registered only with the SEC, or of employees). ZIP+4/Postal Code: 98101-2309 branch office location for a broker-dealer or investment lumber here:

Describe any other *investment-related* business activities conducted from this office location:

	n 1.F. for each location	n. If you are applying for S	siness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or or of employees).
Number and Street 1: 1231 S. CALIFORNIA BLVD		Number and Street 2:	
City: WALNUT CREEK	State: California	Country: United States	ZIP+4/Postal Code: 94596-5122
If this address is a private residence, check this be	оох: 🗆		
Telephone Number: 925-974-2900	Facsimile Number, if 925-974-2929	any:	
If this office location is also required to be registed adviser on the Uniform Branch Office Registration 100678		•	s a branch office location for a broker-dealer or investment n Number here:
How many <i>employees</i> perform investment advisor	ry functions from this c	office location?	
Are other business activities conducted at this off ✓ (1) Broker-dealer (registered or unregistered) — (2) Bank (including a separately identifiable dealer (3) Insurance broker or agent — (4) Commodity pool operator or commodity transport (5) Registered municipal advisor — (6) Accountant or accounting firm — (7) Lawyer or law firm	epartment or division o	f a bank)	m registration)
Describe any other investment-related business a	activities conducted from	m this office location:	
	n 1.F. for each locatior	n. If you are applying for S	siness, at which you conduct investment advisory business. SEC registration, if you are registered only with the SEC, or of employees).
Number and Street 1: 70 HUDSON STREET		Number and Street	2:
City: JERSEY CITY	State: New Jersey	Country: United States	ZIP+4/Postal Code: 07302-4585
If this address is a private residence, check this k	oox:		
Telephone Number: 800 934-4448	Facsimile Number, if a	ny:	
If this office location is also required to be registed adviser on the Uniform Branch Office Registration 778149		•	a branch office location for a broker-dealer or investment n Number here:
How many <i>employees</i> perform investment advisor	ry functions from this c	office location?	
Are other business activities conducted at this off ✓ (1) Broker-dealer (registered or unregistered) ✓ (2) Bank (including a separately identifiable dealer (3) Insurance broker or agent ✓ (4) Commodity pool operator or commodity trace (5) Registered municipal advisor	epartment or division o	f a bank)	m registration)

(6) Accountant or accounting firm	n		
(7) Lawyer or law firm			
Describe any other investment-rela	ted business activities conducted from	this office location:	
You must complete a separate Scho		If you are applying for SEC req	at which you conduct investment advisory business. gistration, if you are registered only with the SEC, or mployees).
Number and Street 1:		Number and Street 2:	
4529 SHARON ROAD	Chata	O a complete o	71D A/Dastal Carla
City: CHARLOTTE	State: North Carolina	Country: United States	ZIP+4/Postal Code: 28211-3521
If this address is a private residence	e, check this box:		
Telephone Number:	Facsimile Number, if any:		
704-367-9742	704-367-9702		
•	ed to be registered with FINRA or a <i>sta</i> ce Registration Form (Form BR), please	_	nch office location for a broker-dealer or investment ber here:
How many <i>employees</i> perform inve	stment advisory functions from this of	fice location?	
☐ (3) Insurance broker or agent☐ (4) Commodity pool operator or☐ (5) Registered municipal advisor☐ (6) Accountant or accounting firm☐ (7) Lawyer or law firm☐	identifiable department or division of commodity trading advisor (whether r	registered or exempt from regis	stration)
SECTION 1.1. Website Addresses			
List your website addresses, include		•	ms where you control the content (including, but not or each website or account on a publicly available
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTPS://TWITTER.COM/SCHW	VABRESEARCH
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTP://WWW.LINKEDIN.COM/	/COMPANY/SCHWAB-RETIREMENT-SERVICES
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTPS://WELCOME.SCHWAB.	СОМ
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTPS://INTELLIGENT.SCHWA	AB.COM
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTP://TWITTER.COM/SCHWA	AB4RIAS
Address of Website/Account on Pub	olicly Available Social Media Platform:	HTTP://WWW.LINKEDIN.COM/	/COMPANY/SCHWAB-ADVISOR-SERVICES

Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTPS://WWW.SCHWAB.COM	
Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTPS://WWW.FACEBOOK.COM	M/CHARLESSCHWAB/
Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTPS://WWW.YOUTUBE.COM/	USER/CHARLESSCHWAB
Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTP://WWW.LINKEDIN.COM/0	COMPANY/CHARLES-SCHWAB
Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTP://WWW.LINKEDIN.COM/0	COMPANY/SCHWAB-STOCK-PLAN-SERVICES
Address of Website/Account on Publicly Available Soc	ial Media Platform:	HTTP://TWITTER.COM/CHARLES	SSCHWAB
SECTION 1.L. Location of Books and Records			
Complete the following information for each location must complete a separate Schedule D, Section 1.L. for		your books and records, other th	nan your <i>principal office and place of business</i> . You
Name of entity where books and records are kept: CHARLES SCHWAB & CO., INC.			
Number and Street 1: 4150 KINROSS LAKES PARKWAY		Number and Street 2:	
City: RICHFIELD	State: Ohio	Country: United States	ZIP+4/Postal Code: 44286
If this address is a private residence, check this box:			
Telephone Number: (330) 908-4600	Facsimile number (330) 908-4601	r, if any:	
This is (check one): one of your branch offices or affiliates.			
o a third-party unaffiliated recordkeeper. o other.			
Briefly describe the books and records kept at this lo RECORDS RELATED TO THE GUIDED CHOICE SERVICE		SH SCHWAB	
Name of entity where books and records are kept: SMARSH INC			
Number and Street 1: 851 SW 6TH AVE		Number and Street 2: SUITE 800	
	State: Oregon	Country: United States	ZIP+4/Postal Code: 97204
If this address is a private residence, check this box:	П		
Telephone Number: 646-247-8003	Facsimile number,	if any:	
This is (check one):			

O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this EMAIL AND INSTANT MESSAGE ARCHIVAL SYSTEM	location.		
Name of entity where books and records are kept: IRON MOUNTAIN			
Number and Street 1: 4449 S 36TH STREET		Number and Street 2:	
City: PHOENIX	State: Arizona	Country: United States	ZIP+4/Postal Code: 85041
If this address is a private residence, check this box	к: 🗖		
Telephone Number: (602)437-9522	Facsimile number, i	if any:	
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.other.			
Briefly describe the books and records kept at this OFFSITE STORAGE FACILITY FOR RECORDS NOT REC		ON SITE.	
Name of entity where books and records are kept: CHARLES SCHWAB & CO., INC.			
Number and Street 1: 4750 E. FRANCISCO		Number and Street 2:	
City: PHOENIX	State: Arizona	Country: United States	ZIP+4/Postal Code: 85044-5359
If this address is a private residence, check this box	к: П		
Telephone Number: (800) 777-3337	Facsimile number, (602) 355-4854	if any:	
This is (check one): one of your branch offices or affiliates.			
O a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this RECORDS FOR THE SCHWAB ADVISOR NETWORK SE		INSTITUTIONAL MANAGED ACCO	UNT SELECT PROGRAM.
Name of entity where books and records are kept: MICRO FOCUS INTERNATIONAL PLC			
Number and Street 1: 4555 GREAT AMERICA PARKWAY		Number and Street 2: STE 400	
3	State: California	Country: United States	ZIP+4/Postal Code: 95054
If this address is a private residence, check this box	х. П		

Telephone Number: 650-258-2876	Facsimile number, if a	ny:	
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
C other.			
Briefly describe the books and records kept at this EMAIL AND INSTANT MESSAGE ARCHIVAL SYSTEM	s location.		
Name of entity where books and records are kept IRON MOUNTAIN	:		
Number and Street 1: 21063 FORBES STREET		Number and Street 2:	
City: HAYWARD	State: California	Country: United States	ZIP+4/Postal Code: 94545
If this address is a private residence, check this bo	ox:		
Telephone Number: 510-287-5475	Facsimile number, if ar	ny:	
This is (check one): O one of your branch offices or affiliates.			
a third-party unaffiliated recordkeeper.			
O other.			
Briefly describe the books and records kept at this OFFSITE STORAGE FACILITY FOR RECORDS NOT RE		I SITE.	
SECTION 1.M. Registration with Foreign Financia	Regulatory Authoritie	es	
	No In	formation Filed	
Item 2 SEC Registration/Reporting			
	•	•	EC. Complete this Item 2.A. only if you are applying for ling an <i>umbrella registration</i> , the information in Item 2
	ration and you are no I	onger eligible to register	(1) through 2.A. (12), below. If you are submitting an with the SEC, check Item 2.A. (13). Part 1A Instruction 2 these items.
\square (1) are a large advisory firm that either	r:		
(a) has regulatory assets under man	agement of \$100 million	n (in U.S. dollars) or more	e; or
(b) has regulatory assets under manamendment and is registered wit	•	(in U.S. dollars) or more	at the time of filing its most recent annual updating
(2) are a mid-sized advisory firm that I million (in U.S. dollars) and you are e		nder management of \$25	5 million (in U.S. dollars) or more but less than \$100
(a) not required to be registered as of business; or	an adviser with the sta	te securities authority of t	the state where you maintain your principal office and place
(b) not subject to examination by th	e state securities author	rity of the state where yo	u maintain your <i>principal office and place of business</i> ;
Click HERE for a list of states in wathority.	hich an investment advis	ser, if registered, would no	t be subject to examination by the state securities

(3) Reserved

_	are an investment adviser to Investment Company Act of management; are a pension consultant within rule 203A-2(a); are a related adviser under registered with the SEC, and If you check this box, complete are an adviser relying on rule If you check this box, complete the second seco	to a company which has ended and has not withdrawall the respect to assets of plant rule 203A-2(b) that control your principal office and pute Section 2.A. (8) of Schedule 203A-2(c) because you	elected to be a business development of the election, and you have at least ans having an aggregate value of at the election of the election of the election, and you have at least ans having an aggregate value of at the election of the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election, and you have at least answer that the election of the el	ent company pursuant to section 54 of the ast \$25 million of regulatory assets under the least \$200,000,000 that qualifies for the mon control with, an investment adviser the registered adviser;	er ne exempt
(7) (8) (9)	Investment Company Act of management; are a pension consultant within rule 203A-2(a); are a related adviser under registered with the SEC, and If you check this box, complete are an adviser relying on rule of the second	1940 and has not withdra th respect to assets of planning the 203A-2(b) that control your principal office and pute Section 2.A.(8) of Schedule 203A-2(c) because you	own the election, and you have at least ans having an aggregate value of at a cols, is controlled by, or is under commolace of business is the same as the results.	ast \$25 million of regulatory assets under the state of t	er ne exempt
(8) (9)	in rule 203A-2(a); are a related adviser under registered with the SEC, and If you check this box, complete are an adviser relying on rule If you check this box, complete the second se	rule 203A-2(b) that control d your principal office and p te Section 2.A.(8) of Schedu le 203A-2(c) because you	ols, is controlled by, or is under commolace of business is the same as the r	non <i>control</i> with, an investment adviser t	·
(9)	registered with the SEC, and If you check this box, complete are an adviser relying on rul If you check this box, complete	d your <i>principal office and p</i> te Section 2.A.(8) of Schedu le 203A-2(c) because you	place of business is the same as the r		that is
	are an adviser relying on rul	le 203A-2(c) because you	ule D.		
	are an adviser relying on rul	le 203A-2(c) because you			
_	If you check this box, complet		expect to be eligible for SEC regist	tration within 120 days:	
(10)		to Section 2 A (Q) of School			
- (10)	The second secon				
		,	n 15 or more states and is relying or	n ruie 203A-2(d);	
	If you check this box, complet	te Section 2.A.(10) of Sched	dule D.		
(11)	are an Internet adviser rely	ring on rule 203A-2(e);			
(12)	have received an SEC order	r exempting you from the	prohibition against registration with	the SEC;	
	If you check this box, complet	te Section 2.A.(12) of Sched	dule D.		
(13)	are no longer eligible to ren	main registered with the S	EC.		
Securi	ties Authority Notice Filings	and State Reporting by I	Exempt Reporting Advisers		
the SE		next to the state(s) that	you would like to receive notice of the	ck the box(es) next to the state(s) that you amendment to direct your notice filings on the state and all subsequent filings or reports young to state(s) that currently receive the	or reports you subm
the SE	EC. If this is an amendment to es) next to those state(s).	next to the state(s) that	you would like to receive notice of the	amendment to direct your <i>notice filings</i> this and all subsequent filings or reports y	or reports you subm
the SEne box(EC. If this is an amendment to es) next to those state(s).	next to the state(s) that your registration to stop	you would like to receive notice of the your <i>notice filings</i> or reports from go	amendment to direct your <i>notice filings</i> this and all subsequent filings or reports yoing to state(s) that currently receive the	or reports you subm
o the SE ne box(Jurisdict	EC. If this is an amendment to es) next to those state(s).	next to the state(s) that your registration to stop	you would like to receive notice of the your <i>notice filings</i> or reports from go	n amendment to direct your notice filings on amendment to direct your notice filings on the same all subsequent filings or reports young to state(s) that currently receive the same same same same same same same sam	or reports you subm
o the SE ne box(Jurisdict AL AK	EC. If this is an amendment to es) next to those state(s).	next to the state(s) that your registration to stop	you would like to receive notice of the your <i>notice filings</i> or reports from go	amendment to direct your notice filings on amendment to direct your notice filings on this and all subsequent filings or reports young to state(s) that currently receive the state of the	or reports you subm
o the SEne box(Jurisdict AL AK AZ	EC. If this is an amendment to es) next to those state(s).	next to the state(s) that your registration to stop IL IN IA	you would like to receive notice of the your notice filings or reports from good NE NE NV NH	amendment to direct your notice filings on amendment to direct your notice filings of his and all subsequent filings or reports yoing to state(s) that currently receive the SC SC SD TN	or reports you subm
Jurisdict AL AK AZ AR	EC. If this is an amendment to es) next to those state(s).	next to the state(s) that your registration to stop IL IN IA KS	you would like to receive notice of the your notice filings or reports from good NE NE NV NH NJ	amendment to direct your notice filings on amendment to direct your notice filings of his and all subsequent filings or reports yoing to state(s) that currently receive the solution of the state of the solution of the sol	or reports you subm
Jurisdict AL AK AZ AR CA	EC. If this is an amendment to es) next to those state(s). tions	next to the state(s) that your registration to stop IL IN IA KS KY	you would like to receive notice of the your notice filings or reports from good NE NE NV NH NJ NM	a amendment to direct your notice filings on amendment to direct your notice filings of his and all subsequent filings or reports young to state(s) that currently receive the Sc Sc Sc Sc Sc TN ▼ TX ▼ UT	or reports you subm
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the SE ne box(Jurisdict Value AL Value AK Value CA Value CO Value CT V	EC. If this is an amendment to es) next to those state(s). tions	next to the state(s) that your registration to stop IL IN IN KS KY LA ME MD MA MI MN MN MS	you would like to receive notice of the your notice filings or reports from good notice filings or notice of the your notice filings or reports from good notice filings from goo	amendment to direct your notice filings of his and all subsequent filings or reports young to state(s) that currently receive the soing to state(s) that currently receive the SC SD TN TX TX VT UT VT	or report you subn

Name of Registered Investment Adviser

106753

CHARLES SCHWAB INVESTMENT MANAGEMENT, INC

CRD Number of Registered Investment Adviser

801 - 35905
SECTION 2.4 (0) Investment Advisor Expecting to be Eligible for Commission Degistration within 120 Days
If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations: I am not registered or required to be registered with the SEC or a state securities authority and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective. I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.
SECTION 2.A.(10) Multi-State Adviser
If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.
If you are applying for registration as an investment adviser with the SEC, you must make both of these representations: I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the state securities authorities in those states.
I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the <i>state securities authorities</i> of those states.
If you are submitting your annual updating amendment, you must make this representation:
Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the state securities authorities in those states.
SECTION 2.A.(12) SEC Exemptive Order
If you are relying upon an SEC <i>order</i> exempting you from the prohibition on registration, provide the following information:
Application Number: 803-
Date of order:
Item 3 Form of Organization If you are filling an umbrella registration, the information in Item 2 should be provided for the filling advices only.
If you are filing an <i>umbrella registration</i> , the information in Item 3 should be provided for the <i>filing adviser</i> only. A. How are you organized?
A. How are you organized? © Corporation
Sole Proprietorship
C Limited Liability Partnership (LLP)
O Partnership
C Limited Liability Company (LLC)
C Limited Partnership (LP)
Other (specify):
If you are changing your response to this Item, see Part 1A Instruction 4.
B. In what month does your fiscal year end each year? DECEMBER
C. Under the laws of what state or country are you organized? State Country California United States
If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the
name of the state or country where you reside. If you are changing your response to this Item, see Part 1A Instruction 4.

SEC Number of Registered Investment Adviser

			Yes No
Α.		you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your cture or legal status (e.g., form of organization or state of incorporation)?	0 0
	If "y	ves", complete Item 4.B. and Section 4 of Schedule D.	
B.	Date	e of Succession: (MM/DD/YYYY)	
	If yo	ou have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instru	ction 4.
SEC	TION	I 4 Successions	
		No Information Filed	
ten	n 5 In	nformation About Your Advisory Business - Employees, Clients, and Compensation	
	•	es to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when ma ry policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.	king
Em	ploye	ees	
_	oloyee	e organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an experience performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5). roximately how many employees do you have? Include full- and part-time employees but do not include any clerical workers.	
B.	(1)	Approximately how many of the <i>employees</i> reported in 5.A. perform investment advisory functions (including research)? 3677	
	(2)	Approximately how many of the <i>employees</i> reported in 5.A. are registered representatives of a broker-dealer? 13081	
	(3)	Approximately how many of the <i>employees</i> reported in 5.A. are registered with one or more <i>state securities authorities</i> as <i>investment advised representatives</i> ?	-
		3677	
	(4)	Approximately how many of the <i>employees</i> reported in 5.A. are registered with one or more <i>state securities authorities</i> as <i>investment advises</i> representatives for an investment adviser other than you? 820	•
	(5)	Approximately how many of the <i>employees</i> reported in 5.A. are licensed agents of an insurance company or agency? 2765	
	(6)	Approximately how many firms or other <i>persons</i> solicit advisory <i>clients</i> on your behalf? 2	

In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.

Clients

Item 4 Successions

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

- C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?
 827177
 - (2) Approximately what percentage of your *clients* are non-*United States persons*? 0%
- D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships.

 The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (1)(d) or (3)(d) below.

Indicate the approximate number of your clients and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of client. If you have fewer than 5 clients in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting clients and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than high net worth individuals)			\$
(b) High net worth individuals			\$
(c) Banking or thrift institutions			\$
(d) Investment companies			\$
(e) Business development companies			\$
(f) Pooled investment vehicles (other than investment companies and business development companies)			\$
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)			\$
(h) Charitable organizations			\$
(i) State or municipal <i>government entities</i> (including government pension plans)			\$
(j) Other investment advisers			\$
(k) Insurance companies			\$
(I) Sovereign wealth funds and foreign official institutions			\$
(m) Corporations or other businesses not listed above			\$
(n) Other:			\$

compensation	Arrangements

COI	inpensation Arrangements								
Ε.	You	are c	ompensated for your investment advisory services by (check all that apply):						
		(1)	A percentage of assets under your management						
		(2)	Hourly charges						
		(3)	Subscription fees (for a newsletter or periodical)						
	V	(4)	Fixed fees (other than subscription fees)						
		(5)	Commissions						
		(6)	Performance-based fees						
	V	(7)	Other (specify): ASSET BASED FEES FOR WRAP PGRMS & SUBSC PRICING FOR FIN PLANNING						

F. (1) Do you provide continuous and regular supervisory or management services to securities portfolios? (2) If yes, what is the amount of your regulatory assets under management and total number of accounts? U.S. Dollar Amount Total Number of Accounts Discretionary: (a) \$ (d) Non-Discretionary: (b) \$ (e)	Yes N
(2) If yes, what is the amount of your regulatory assets under management and total number of accounts? U.S. Dollar Amount Total Number of Accounts Discretionary: (a) \$ (d)	0 6
U.S. Dollar Amount Total Number of Accounts Discretionary: (a) \$ (d)	
Discretionary: (a) \$ (d)	
Non-Discretionary: (b) \$ (e)	
(c)	
Total: (c) \$ (f)	

(3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to clients who

Item 5 Information About Your Advisory Business - Advisory Activities

Advisory Activities

- What type(s) of advisory services do you provide? Check all that apply.
 - (1) Financial planning services

are non-United States persons?

(2) Portfolio management for individuals and/or small businesses

section 54 of the Investment Company Act of 1940)	iopinient companies that have made an election pursuant to	
(4) Portfolio management for pooled investment vehicles (other than investmen (5) Portfolio management for businesses (other than small businesses) or instit	•	-1
(5) Portfolio management for businesses (other than small businesses) or instit other pooled investment vehicles)	utional <i>clients</i> (other than registered investment companies and	d
(6) Pension consulting services		
(7) Selection of other advisers (including <i>private fund</i> managers) (8) Publication of periodicals or newsletters		
 □ (8) Publication of periodicals or newsletters □ (9) Security ratings or pricing services 		
[(10) Market timing services		
□ (11) Educational seminars/workshops□ (12) Other(specify): WRAP FEE PROGRAM SPONSOR AND FINANCIAL PLANNING AD	OVISOR REFERRAL PROGRAM	
(12) Other (speedig). With TEET ROOM WISTONSON THE THROUGH TE ANNUMENTE TEANNUMENTE	WISSIN NEI ERROLE I ROGIO WI	
Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), reinvestment companies to which you provide advice in Section 5.G.(3) of Schedule D.	, , ,	ie
If you provide financial planning services, to how many clients did you provide these se	ervices during your last fiscal year?	
O 0		
O 1 - 10		
O 11 - 25		
O 26 - 50		
o 51 - 100		
O 101 - 250 O 251 - 500		
More than 500 If more than 500, how many?		
34,000 (round to the nearest 500)		
In your responses to this Item 5.H., do not include as "clients" the investors in a private t with those investors.	fund you advise, unless you have a separate advisory relationship	
	Yes	No
(1) Do you participate in a wrap fee program?	•	0
(2) If you participate in a wrap fee program, what is the amount of your regulatory asse	ets under management attributable to acting as:	
(a) sponsor to a wrap fee program \$ 0		
(b) portfolio manager for a <i>wrap fee program</i> ? \$ 0		
(c) <i>sponsor</i> to and portfolio manager for the same <i>wrap fee program</i> ? \$ 0		
If you report an amount in Item 5.1.(2)(c), do not report that amount in Item 5.1.(2)(a) or	Item 5.1.(2)(b).	
If you are a portfolio manager for a wrap fee program, list the names of the programs, their	ir sponsors and related information in Section 5.1.(2) of Schedule E).
If your involvement in a wrap fee program is limited to recommending wrap fee programs to	to your clients, or you advise a mutual fund that is offered through	ı a
wrap fee program, do not check I tem 5.1.(1) or enter any amounts in response to I tem 5.1		
	Yes	No
(1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide i investments?	nvestment advice only with respect to limited types of	•
(2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different regulatory assets under management?	ent method than the method used to compute your	•
Separately Managed Account <i>Clients</i>		
	Yes	No
(1) Do you have regulatory assets under management attributable to <i>clients</i> other tha managed account <i>clients</i>)?	in those listed in Item 5.D.(3)(d)-(f) (separately	⊙
If yes, complete Section 5.K.(1) of Schedule D.		
(2) Do you engage in borrowing transactions on behalf of any of the separately manage	ged account <i>clients</i> that you advise?	•
If yes, complete Section 5.K.(2) of Schedule D.		
(3) Do you engage in derivative transactions on behalf of any of the separately manage	ged account <i>clients</i> that you advise?	e
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K.

	If yes, complete Section 5.K.(2) of Schedule D.		
	(4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management?	0	•
	If yes, complete Section 5.K.(3) of Schedule D for each custodian.		
L.	Marketing Activities	Yes	No
	(1) Do any of your advertisements include:		
	(a) Performance results?	•	0
	(b) A reference to specific investment advice provided by you (as that phrase is used in rule 206(4)-1(a)(5))?	0	•
	(c) Testimonials (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
	(d) Endorsements (other than those that satisfy rule 206(4)-1(b)(4)(ii))?	0	•
	(e) Third-party ratings?	•	0
	(2) If you answer "yes" to L(1)(c), (d), or (e) above, do you pay or otherwise provide cash or non-cash compensation, directly or indirectly, in connection with the use of <i>testimonials</i> , <i>endorsements</i> , or <i>third-party ratings</i> ?	0	0
	(3) Do any of your advertisements include hypothetical performance?	•	0
	(4) Do any of your advertisements include predecessor performance?	0	•
SEC	CTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies		
	No Information Filed		
SEC	CTION 5.1.(2) Wrap Fee Programs		

No Information Filed

SECTION 5.K.(1) Separately Managed Accounts

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a)	Asset Type	Mid-year	End of year
	(i) Exchange-Traded Equity Securities	%	%
	(ii) Non Exchange-Traded Equity Securities	%	%
	(iii) U.S. Government/Agency Bonds	%	%
	(iv) U.S. State and Local Bonds	%	%

(v)	Sovereign Bonds	%	%
(vi)	Investment Grade Corporate Bonds	%	%
(vii)	Non-Investment Grade Corporate Bonds	%	%
(viii)	Derivatives	%	%
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%	%
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%	%
(xi)	Cash and Cash Equivalents	%	%
(xii)	Other	%	%

Generally describe any assets included in "Other"

Asse	et Type	End of year			
(i)	Exchange-Traded Equity Securities	%			
(ii)	Non Exchange-Traded Equity Securities	%			
(iii)	iii) U.S. Government/Agency Bonds				
(iv)	U.S. State and Local Bonds	%			
(v)	Sovereign Bonds	%			
(vi)	Investment Grade Corporate Bonds	%			
(vii)	Non-Investment Grade Corporate Bonds	%			
(viii)	Derivatives	%			
(ix)	Securities Issued by Registered Investment Companies or Business Development Companies	%			
(x)	Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%			
(xi)	Cash and Cash Equivalents	%			
(xii)	Other	%			

Generally describe any assets included in "Other"

SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowingsand Derivatives

✓ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of borrowings for the accounts included in column 1.

In column 3, provide aggregate gross notional value of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3)	Derivative E	xposures		
			(a) Interest Rate	(b) Foreign Exchange	(c) Credit	(d) Equity	(e) Commodity	(f) Other

		Derivative	Derivative	Derivative	Derivative	Derivative	Derivative
Less than 10%	\$ \$	%	%	%	%	%	%
10-149%	\$ \$	%	%	%	%	%	%
150% or more	\$ \$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings		(3)	Derivative E	xposures		
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of borrowings for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$	\$
10-149%	\$	\$
150% or more	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which borrowings and derivatives are used in the management of the separately managed accounts that you advise.

SECTION 5.K.(3) Custodians for Separately Managed Accounts

No Information Filed

Item 6 Other Business Activities

In this Item, we request information about your firm's other business activities.

- A. You are actively engaged in business as a (check all that apply):
 - ☑ (1) broker-dealer (registered or unregistered)
 - (2) registered representative of a broker-dealer
 - (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
 - (4) futures commission merchant
 - (5) real estate broker, dealer, or agent
 - (6) insurance broker or agent
 - (7) bank (including a separately identifiable department or division of a bank)
 - (8) trust company
 - (9) registered municipal advisor
 - (10) registered security-based swap dealer

		(11) major security-based swap participant(12) accountant or accounting firm	
		(13) lawyer or law firm	
		(14) other financial product salesperson (specify):	
	If yo	ou engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.	
			es No
B.	(1)	Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)?	0 0
	(2)	If yes, is this other business your primary business?	0 0
		If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that na	
	(2)	Do you sell products or provide services other than investment advice to your advisory clients?	es No
	(3)	Do you sell products of provide services other than investment advice to your advisory <i>thems?</i>	• ·
		If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name	ne.
SEC	TION	8 6.A. Names of Your Other Businesses	
		No Information Filed	
SEC	TION	I 6.B.(2) Description of Primary Business	
Des	cribe	e your primary business (not your investment advisory business):	
If y	ou er	ngage in that business under a different name, provide that name:	
		4 6.B.(3) Description of Other Products and Services e other products or services you sell to your client. You may omit products and services that you listed in Section 6.B.(2) above.	
		DEALER PRODUCT AND SERVICES.	
,		ngage in that business under a different name, provide that name:	
N/A			
ten	n 7 Fi	inancial Industry Affiliations	
In t	his It	tem, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interestate you and your clients.	t may
Α.		s part of Item 7 requires you to provide information about you and your related persons, including foreign affiliates. Your related persons are all	of your
		isory affiliates and any person that is under common control with you.	
	You	have a <i>related person</i> that is a (check all that apply): (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)	
	V	(2) other investment adviser (including financial planners)	
		(3) registered municipal advisor	
		(4) registered security-based swap dealer(5) major security-based swap participant	
	V	(6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)	
	굣	(7) futures commission merchant	
	マ	(8) banking or thrift institution	
		(9) trust company(10) accountant or accounting firm	
		(11) lawyer or law firm	
	▽	(12) insurance company or agency	
		(13) pension consultant	
		(14) real estate broker or dealer(15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	
		(16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
	Not	te that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representative	es of a
	broi	ker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of h's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).	
		te that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to cometion 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.	olete

For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of

Schedule D.

You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.

You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

SEC	OIT	7.A. Financial Industry Affiliations		
Coi	mplet	e a separate Schedule D Section 7.A. for each <i>related person</i> listed in Item 7.A.		
1.	_	al Name of <i>Related Person</i> : AMERITRADE CLEARING, INC.		
2.		nary Business Name of <i>Related Person</i> : AMERITRADE CLEARING, INC.		
3.		eted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 16335		
4.	Relation (a)	cRD Number (if any): 5633 CIK Number(s) (if any): CIK Number 36793		
5.	Relation (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (n) (o) (p)	broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	Yes	No
6.	Do y	you control or are you controlled by the related person?		⊙
7.	Are	you and the related person under common control?	•	0
8.	(a) (b)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?		0
	(c)	If you have answered "yes" to question 8. (a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	'asse	ets:
			Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		

10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed	ed.	
11.	Do y	you and the related person share any supervised persons?	0	•
12.	Do y	you and the <i>related person</i> share the same physical location?	0	•
1	Lagr	al Name of Delated Demons		
1.	_	al Name of <i>Related Person</i> : RLES SCHWAB, HONG KONG, LIMITED		
2.		nary Business Name of <i>Related Person</i> : RLES SCHWAB, HONG KONG, LIMITED		
3.	Rela -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
1.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any):		
		No Information Filed		
5.	Rela (a)	ted Person is: (check all that apply) Discrete Person is: (check all that apply) Discrete Person is: (check all that apply)		
	(b)	other investment adviser (including financial planners) registered municipal advisor		
	` ,	registered security-based swap dealer major security-based swap participant		
	(f) (g)	 commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant 		
	(h) (i)	□ banking or thrift institution□ trust company		
	(j) (k)	□ accountant or accounting firm □ lawyer or law firm		
	(l)	insurance company or agency		
	(m) (n)	pension consultant real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
ó.	Do y	you control or are you controlled by the related person?	0	•
7.	Are	you and the related person under common control?	•	0
3.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients's</i> Number and Street 2: City: State: Country: ZIP+4/Postal Code:	asse	ts:
		If this address is a private residence, check this box: \Box		NI.
9.	(a)		Yes O	
	(b)	If the answer is yes, under what exemption?	~	~
10.	(a)		•	0
	(b)	If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i> Hong Kong - Securities and Futures Commission	ea.	
11.	Do \	you and the related person share any supervised persons?	0	_

12.	Do you and the <i>related person</i> share the same physical location?	0	•
1.	Legal Name of <i>Related Person</i> : CHARLES SCHWAB FUTURES AND FOREX LLC		
2.	Primary Business Name of <i>Related Person</i> : CHARLES SCHWAB FUTURES AND FOREX LLC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's		
	(a) CRD Number (if any):(b) CIK Number(s) (if any):		
	No Information Filed		
	Related Person is: (check all that apply) (a) broker-dealer, municipal securities dealer, or government securities broker or dealer (b) other investment adviser (including financial planners) (c) registered municipal advisor (d) registered security-based swap dealer (e) major security-based swap participant (f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) futures commission merchant (h) banking or thrift institution (i) trust company (j) accountant or accounting firm (k) lawyer or law firm (l) insurance company or agency (m) pension consultant (n) real estate broker or dealer (o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	Yes	
	Do you control or are you controlled by the related person?	0	•
7.	Are you and the related person under common control?	•	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	\odot
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1: Number and Street 2:	assı	ets:
	City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No
	(b) If the answer is yes, under what exemption?		
10.	 (a) Is the related person registered with a foreign financial regulatory authority? (b) If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registed. No Information Filed 		•
11.	Do you and the related person share any supervised persons?	•	0
12.	Do you and the <i>related person</i> share the same physical location?	•	0
1.	Legal Name of Related Person:		

CHARLES SCHWAB INVESTMENT ADVISORY, INC.

2.		nary Business Name of <i>Related Person</i> : RLES SCHWAB INVESTMENT ADVISORY, INC		
3.	801	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) - 70737		
	or Othe			
4.		CRD Number (if any):		
	(a)	CRD Number (if any): 151739		
	(b)	CIK Number(s) (if any):		
		CIK Number		
		1501902		_
5.	Rela	ted Person is: (check all that apply)		
	(a)	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) (c)	other investment adviser (including financial planners) registered municipal advisor		
	(d)	registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant banking or thrift institution		
	(h) (i)	□ banking or thrift institution□ trust company		
	(j)	accountant or accounting firm		
	(k)	lawyer or law firm		
	(l) (m)	insurance company or agency pension consultant		
	(n)	real estate broker or dealer		
	(0)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do y		es O	
7.	Are	you and the <i>related person</i> under common <i>control</i> ?	•	,
				•
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	(
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients's	asse	ets:
		Number and Street 1: Number and Street 2:		
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			es/	N
9.	(a)	If the related person is an investment adviser, is it exempt from registration?	0	0
	(b)	If the answer is yes, under what exemption?		
10	(2)	Is the related person registered with a foreign financial regulatory authority?	_	_
	(a) (b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered. No Information Filed	○ ed.	(
11	Do y	you and the related person share any supervised persons?	•	C
12	Do y	you and the <i>related person</i> share the same physical location?	0	C
1.	_	al Name of <i>Related Person</i> : AMERITRADE, INC.		
		nary Business Name of <i>Related Person</i> :		
2.		AMERITRADE, INC.		
3.	Rela	eted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		

		8 - 23395			
		or Other			
	4.	Related Person's			
	••	(a) CRD Number (if any):			
		7870			
		(b) CIK Number(s) (if any): CIK Number			
		277841			
	5.	Related Person is: (check all that apply)			
		(a) For broker-dealer, municipal securities dealer, or government	ent securities broke	er or dealer	
		(b) other investment adviser (including financial planners)			
		(c) registered municipal advisor			
		(d) ☐ registered security-based swap dealer(e) ☐ major security-based swap participant			
		 (f) □ commodity pool operator or commodity trading advisor 	· (whether reaister	ed or exempt from registration)	
		(g) ☐ futures commission merchant	(11 1 1 3 111	3,	
		(h) \square banking or thrift institution			
		(i) trust company			
		(j) accountant or accounting firm			
		(k) □ lawyer or law firm(l) □ insurance company or agency			
		(I) □ insurance company or agency(m) □ pension consultant			
		(n) real estate broker or dealer			
		(o) \square sponsor or syndicator of limited partnerships (or equiva	alent), excluding po	poled investment vehicles	
		(p) \square sponsor, general partner, managing member (or equivalent)	alent) of pooled inv	vestment vehicles	
	,				Yes No
	6.	Do you control or are you controlled by the related person?			0 @
	7.	Are you and the related person under common control?			⊙ 0
	8.	(a) Does the <i>related person</i> act as a qualified custodian for your	r <i>clients</i> in connecti	on with advisory services you provide to clients?	0 0
	0.	(b) If you are registering or registered with the SEC and you have			0 0
		presumption that you are not operationally independent (pu	•	•	0 0
		required to obtain a surprise examination for your clients' fu	unds or securities t	hat are maintained at the related person?	
		(c) If you have answered "yes" to question 8.(a) above, provid			lients' assets
		Number and Street 1: City: State:	Number and S Country:	ZIP+4/Postal Code:	
		If this address is a private residence, check this box:	Courtify.	ZII 14/1 Ostal Code.	
					Yes No
	9.	(a) If the <i>related person</i> is an investment adviser, is it exempt fr	rom registration?		0 0
		(b) If the answer is yes, under what exemption?			
	10				
	10.	(a) Is the related person registered with a foreign financial regula		., ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,	0 0
		(b) If the answer is yes, list the name and country, in English of	of each <i>foreign finan</i> No Informatio		egistered.
	11.	Do you and the related person share any supervised persons?			⊙ ○
	12.	Do you and the <i>related person</i> share the same physical location?			⊙ ○
	1.	Legal Name of Related Person:			
		CHARLES SCHWAB TRUST COMPANY OF DELAWARE			
	2.	Primary Business Name of Related Person:			
		CHARLES SCHWAB TRUST COMPANY OF DELAWARE			
	3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 803	2-)		
		- or			
		Other			
Ш	4.	Related Person's			

	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (k) (l) (m) (n) (o)	ted Person is: (check all that apply) broker-dealer, municipal securities dealer, or government securities broker or dealer other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (whether registered or exempt from registration) futures commission merchant banking or thrift institution trust company accountant or accounting firm lawyer or law firm insurance company or agency pension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do y		es O	No ⊙
7.	Are :	you and the <i>related person</i> under common <i>control</i> ?	•	0
8.	(b)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ? If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ? If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person</i> 's office responsible for <i>custody</i> of your <i>clients</i> ' and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:	0	⊙ O ets:
0	<i>(</i>)	``````````````````````````````````````	es/	
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration? If the answer is yes, under what exemption?	0	0
10.		Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered. No Information Filed	_	•
11.	Do y	rou and the related person share any supervised persons?	0	•
12.	Do y	ou and the related person share the same physical location?	0	0
1.	_	Il Name of <i>Related Person</i> : MERITRADE HONG KONG LIMITED		
2.		ary Business Name of <i>Related Person</i> : MERITRADE HONG KONG LIMITED		
3.	Rela:	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe			
4.	Relai (a)	ted Person's CRD Number (if any):		
		CIK Number(s) (if any):		I
	(10)	No Information Filed		

(a) CRD Number (if any):

5.	Related Person is: (check all that apply)	
	(a) 🗹 broker-dealer, municipal securities dealer, or government securities broker or dealer	
	(b) \square other investment adviser (including financial planners)	
	(c) registered municipal advisor	
	(d) registered security-based swap dealer	
	(e) major security-based swap participant	
	(f) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)	
	(g) futures commission merchant	
	(h) □ banking or thrift institution(i) □ trust company	
	(i) □ trust company(j) □ accountant or accounting firm	
	(k) ☐ lawyer or law firm	
	(i) insurance company or agency	
	(m) pension consultant	
	(n) real estate broker or dealer	
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles	
	(p) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	
		Yes No
6.	Do you control or are you controlled by the related person?	0 0
		~ ~
7.	Are you and the related person under common control?	00
		~ ~
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0 0
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0 0
	presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients</i> ' funds or securities that are maintained at the <i>related person</i> ?	0 0
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>cl</i> Number and Street 1: Number and Street 2:	lients' assets:
	City: State: Country: ZIP+4/Postal Code:	
	If this address is a private residence, check this box: \square	
	(a) If the valeted person is an investment advisor is it even at from registration?	Yes No
9.	(a) If the related person is an investment adviser, is it exempt from registration?	0 0
	(b) If the answer is yes, under what exemption?	
10		
10.	(a) Is the related person registered with a foreign financial regulatory authority?	0 0
	(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is re Name of Country/English Name of <i>Foreign Financial Regulatory Authority</i>	gistered.
	Hong Kong - Securities and Futures Commission	
11.	. Do you and the <i>related person</i> share any <i>supervised persons</i> ?	0 0
12.	Do you and the <i>related person</i> share the same physical location?	0 0
1.	Legal Name of Related Person:	
	SCHWAB WEALTH ADVISORY, INC.	
2.	Primary Business Name of <i>Related Person</i> :	
	SCHWAB WEALTH ADVISORY, INC.	
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)	
	801 - 72795	
	or OU	
	Other	
4	Related Person's	
4.		
	(a) CRD Number (if any): 159035	
	(b) CIK Number(s) (if any):	
	No Information Filed	
5.	Related Person is: (check all that apply)	
	(a) broker-dealer, municipal securities dealer, or government securities broker or dealer	
	(b) other investment adviser (including financial planners)	
	(c) □ registered municipal advisor(d) □ registered security-based swap dealer	
1	TO THE PROJECTOR OF COUNTY PROCESS OWER SOCION	

	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		
	(h)	banking or thrift institution		
	(i) (j)	trust company accountant or accounting firm		
	(k)	lawyer or law firm		
	(I)	insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(o)	sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	⁄es	No
6.	Do v	ou control or are you controlled by the related person?	©	
				٠
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	\circ	\odot
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	\circ	0
		presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i>	asse	≥†\$·
	(0)	Number and Street 1: Number and Street 2:	2000	,,,,,,
		City: State: Country: ZIP+4/Postal Code:		
		If this address is a private residence, check this box: \square	_	
0	(2)	If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes -	
9.	(a)		⊙	О
	(b)	If the answer is yes, under what exemption? RULE 203A-2(B)		
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is register	ed.	
	_	No Information Filed		
11.	ро у	ou and the related person share any supervised persons?	⊙	0
12	Do v	rou and the <i>related person</i> share the same physical location?	_	_
12.	БО у	od und the related person share the same physical location.	⊙	0
1.	_	Il Name of <i>Related Person</i> : RLES SCHWAB TRUST BANK		
	011711			
2.	Prim	ary Business Name of <i>Related Person</i> :		
	CHAI	RLES SCHWAB TRUST BANK		
3.	Pola	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
٥.	-	ted Ferson's SECTHE Number (II arry) (e.g., 601-, 6-, 602-)		
	or			
	Othe			
	NFA	0520175		
4.	Rela	ted Person's		
	(a)	CRD Number (if any):		
	(1.)			
	(b)	CIK Number(s) (if any): CIK Number		
		1776551		\neg
5.		ted Person is: (check all that apply)		
		broker-dealer, municipal securities dealer, or government securities broker or dealer		
		other investment adviser (including financial planners) registered municipal advisor		
	(c) (d)	registered municipal advisor registered security-based swap dealer		
	(e)	major security-based swap participant		
	(f)	commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g)	futures commission merchant		

		banking or thrift institution		
	• • •	 □ trust company □ accountant or accounting firm 		
	0,	lawyer or law firm		
		insurance company or agency		
	(m)	pension consultant		
	(n)	real estate broker or dealer		
	(p)	sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
4	Dox	value antrol or are value antrolled by the related narrow?		s No
0.	БО у	you control or are you controlled by the related person?	О	⊙
7.	Are	you and the related person under common control?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	•	0
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	_	•
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clien	ts' ass	ets:
		Number and Street 1: Number and Street 2:		
		2360 CORPORATE CIRCLE STE 400		
		City: State: Country: ZIP+4/Postal Code:		
		HENDERSON Nevada United States 89074 If this address is a private residence, check this box:		
			Yes	s No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?		0
	(b)	If the answer is yes, under what exemption?		~
10.	(a)	Is the related person registered with a foreign financial regulatory authority?	0	•
	(b)	If the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is regis		
11	D	No Information Filed		
11.	ро у	you and the <i>related person</i> share any <i>supervised persons</i> ?	•	0
12.	Do y	you and the <i>related person</i> share the same physical location?	•	0
1.	_	al Name of <i>Related Person</i> : ARLES SCHWAB PREMIER BANK, SSB		
	СПА	IRLES SCHWAD PREMIER DAIN, SSD		
2.		nary Business Name of <i>Related Person</i> : ARLES SCHWAB PREMIER BANK, SSB		
3.	Rela -	ated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	or		
	Ottic			
4.	Rela (a)	ated Person's CRD Number (if any):		
	(a)			
	(b)	CIK Number(s) (if any): No Information Filed		
5.		ated Person is: (check all that apply)		
	` '	broker-dealer, municipal securities dealer, or government securities broker or dealer		
	` ,	other investment adviser (including financial planners)		
	` ,	registered municipal advisor registered security-based swap dealer		
		major security-based swap dealer major security-based swap participant		
		commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	` '	futures commission merchant		
		banking or thrift institution		
	(i)	trust company		
	(j)	accountant or accounting firm		
	(k)	☐ lawyer or law firm		

	(l)	insurance company or a	agency			
	(m)	pension consultant				
	(n)	real estate broker or de				
	(0)			equivalent), excluding pooled		
	(p)	sponsor, general partners	er, managing member (o	r equivalent) of pooled investm	nent vehicles	
	Davi		ladby the moleted memory			Yes No
6.	ро у	ou <i>control</i> or are you <i>controli</i>	red by the related person?			0 0
7.	Are :	you and the <i>related person</i> ui	nder common <i>control</i> ?			⊙ ○
8.	(a)	Does the related person act	as a qualified custodian t	for your <i>clients</i> in connection w	ith advisory services you provide to <i>clients</i> ?	о о
	(b)	If you are registering or required to obtain a surprise	gistered with the SEC and ot operationally independ e examination for your <i>ci</i>	d you have answered "yes," to dent (pursuant to rule 206(4)-2 lients' funds or securities that a	question 8.(a) above, have you overcome the $f(d)(5)$ from the <i>related person</i> and thus are not are maintained at the <i>related person</i> ?	0 0
	(c)	Number and Street 1: 3000 SCHWAB WAY	to question o.(a) above	Number and Street 2:	lateu persorr's office responsible for custouy or your	cherits assets.
		City:	State:	Country:	ZIP+4/Postal Code:	
		WESTLAKE	Texas	United States	76262	
		If this address is a private i	residence, check this box	: □		
						Yes No
9.	(a)	If the related person is an in	vestment adviser, is it ex	empt from registration?		0 0
	(b)	If the answer is yes, under	what exemption?			
10	(a)	le the related names registed	mad with a family financi	al manufatam cauthanity 2		
10	. (a)	Is the <i>related person</i> registe	_			0 0
	(b)	If the answer is yes, list the	e name and country, in Er	ngiisn of each <i>foreign financiai r</i> No Information File	<i>egulatory authority</i> with which the <i>related person</i> is red	registerea.
11	. Do v	ou and the <i>related person</i> sh	are any supervised perso			⊙ ○
	,		y p			⊙ ○
12	. Do y	ou and the <i>related person</i> sh	are the same physical lo	cation?		⊙ ○
						~ ~
1.	Lega	I Name of <i>Related Person</i> :				
	_	RLES SCHWAB TRUST COMPA	ANY			
2.		ary Business Name of <i>Relate</i>				
	CHAI	RLES SCHWAB TRUST COMPA	ANY			
3.	Rela -	ted Person's SEC File Number	(if any) (e.g., 801-, 8-, 8	66-, 802-)		
	or					
	Othe	er				
4.		ted Person's				
	(a)	CRD Number (if any):				
	(b)	CIK Number(s) (if any):				
	\- /	CIK Number				
		1005180				
		1789219				
5.	Rela	ted Person is: (check all that	apply)			
	(a)		•	vernment securities broker or	dealer	
	(b)		er (including financial pla	nners)		
	(c)	registered municipal ac				
	(d)	registered security-bas	·			
	(e)	major security-based s		advisor (whether registered or	event from registration)	
	(f) (g)	commodity pool operatfutures commission me		advisor (whether registered of	exempt nom registration)	
	(g) (h)	banking or thrift institu				
	(i)	trust company				
	(j)	accountant or accounting	ng firm			
	(k)	☐ lawyer or law firm				
	(I)	insurance company or a	agency			
	(m)	pension consultant				

	(n) real estate broker or dealer		
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) \square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Voo	Nia
6.	Do you control or are you controlled by the related person?	Yes	
0.	Do you control of the you controlled by the related person.	0	•
7.	Are you and the related person under common control?	•	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	_	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not	0	_
	required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ? (c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients'</i>	asso	ets:
	Number and Street 1: Number and Street 2: City: State: Country: ZIP+4/Postal Code:		
	If this address is a private residence, check this box: \Box		
		Yes	No
9.	(a) If the related person is an investment adviser, is it exempt from registration?	\circ	0
	(b) If the answer is yes, under what exemption?		
10	. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	_	_
10.	. (a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? (b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is register	_	⊙
	No Information Filed	eu.	
11.	. Do you and the related person share any supervised persons?	0	•
12.	. Do you and the <i>related person</i> share the same physical location?	\odot	0
1.	Legal Name of <i>Related Person</i> :		
	CHARLES SCHWAB INVESTMENT MANAGEMENT, INC		
2.	Primary Business Name of Related Person:		
	CHARLES SCHWAB INVESTMENT MANAGEMENT, INC		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-) 801 - 35905		
	or		
	Other		
	Deleted Person's		
4.	Related Person's (a) CRD Number (if any):		
	106753		
	(b) CIK Number(s) (if any):		
	CIK Number		
	884546		
5.	Related Person is: (check all that apply)		
	(a) D broker-dealer, municipal securities dealer, or government securities broker or dealer		
	(b) vother investment adviser (including financial planners)		
	(c) registered municipal advisor		
	(d) □ registered security-based swap dealer(e) □ major security-based swap participant		
	(e) L major security-based swap participant(f) ✓ commodity pool operator or commodity trading advisor (whether registered or exempt from registration)		
	(g) utures commission merchant		
	(h)		
	(i) trust company		
	(j) accountant or accounting firm		
	(k) ☐ lawyer or law firm (l) ☐ insurance company or agency		
	(ii) pension consultant		
	(n) \square real estate broker or dealer		
	(o) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles		
	(p) \square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
6.	Do you control or are you controlled by the related person?	Yes	
,, ∪,	Do you do that of all o you do the allowing the relation persons.	()	1.0

7.	Are you and the related person under common control?	•	0
8.	(a) Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection with advisory services you provide to <i>clients</i> ?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	Ö	Ö
	(c) If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1: City: State: Country: ZIP+4/Postal Code:	s'ass∈	ets:
	If this address is a private residence, check this box: \square		
9.	(a) If the <i>related person</i> is an investment adviser, is it exempt from registration?	Yes	No ©
	(b) If the answer is yes, under what exemption?		
10.	(a) Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i>?(b) If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registed.No Information Filed	C ered.	•
11.	Do you and the related person share any supervised persons?	\odot	0
12.	Do you and the related person share the same physical location?	•	0
1.	Legal Name of <i>Related Person</i> : TD AMERITRADE SINGAPORE PTE. LTD.		
2.	Primary Business Name of <i>Related Person</i> : TD AMERITRADE SINGAPORE PTE. LTD.		
3.	Related Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Other		
4.	Related Person's (a) CRD Number (if any):		
	(b) CIK Number(s) (if any): No Information Filed		
5.	Related Person is: (check all that apply) (a) □ broker-dealer, municipal securities dealer, or government securities broker or dealer (b) □ other investment adviser (including financial planners) (c) □ registered municipal advisor (d) □ registered security-based swap dealer (e) □ major security-based swap participant		
	 (f) □ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) (g) □ futures commission merchant (h) □ banking or thrift institution (i) □ trust company 		
	 (j) accountant or accounting firm (k) lawyer or law firm (l) insurance company or agency (m) pension consultant 		
	(n) real estate broker or dealer		
	(o) \square sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles (p) \square sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(p) - sponsor, general partner, managing member (or equivalent) of pooled investment vehicles	Yes	No
6.	Do you control or are you controlled by the related person?	0	•
7.	Are you and the related person under common control?	•	0
8.	(a) Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
	(b) If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	0	0

		presumption that you are not operationally independent (pursuant to rule 206(4)-2 required to obtain a surprise examination for your <i>clients'</i> funds or securities that a			
				asse	ets:
		Number and Street 1: Number and Street			
		City: State: Country: If this address is a private residence, check this box:	ZIP+4/Postal Code:		
			•	Yes	No
9.	(a)	If the related person is an investment adviser, is it exempt from registration?		0	\circ
	(b)	If the answer is yes, under what exemption?			
10.	(a)) Is the related person registered with a foreign financial regulatory authority?		0	0
			egulatory authority with which the related person is register		
		Name of Country/English Name of Foreign Financial Regulatory Authority			
		Singapore - Monetary Authority of Singapore			
11.	Do y	you and the related person share any supervised persons?		0	⊙
12.	Do y	you and the <i>related person</i> share the same physical location?		0	•
				~	
1.	Lega	gal Name of <i>Related Person</i> :			
	CHAF	HARLES SCHWAB BANK, SSB			
2.	Prim	mary Business Name of <i>Related Person</i> :			
۷.		IARLES SCHWAB BANK, SSB			
0	5.7	/			
3.	reiai -	elated Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)			
	or				
	Othe NFA	her A 0352868			
		,, 5552555			
4.		elated Person's			
	(a)	CRD Number (if any):			
	(b)				
		CIK Number 1463807			
		1403007			
5.		elated Person is: (check all that apply)	de elec		
	` '		leaier		
	` ,				
	` ,				
	` '		evenut from registration)		
	.,		exempt moin registration)		
	(h)	banking or thrift institution			
	` '	trust company			
	0,	accountant or accounting firmlawyer or law firm			
	` ,	insurance company or agency			
	` '	_			
	. ,				
	(۲)	2 sponson, general partner, managing member (or equivalent, or pooled investi-		Yes	No
6.	Do y	you control or are you controlled by the related person?		0	\odot
7	Λ	a you and the related person under common control		-	
1.	Are)	e you and the <i>related person</i> under common <i>control</i> ?		•	0
8.	(a)	Does the <i>related person</i> act as a qualified custodian for your <i>clients</i> in connection w	th advisory services you provide to clients?	•	0
			•	Õ	•
		presumption that you are not operationally independent (pursuant to rule 206(4)-2 required to obtain a surprise examination for your <i>clients</i> ' funds or securities that a	•		
		If you have answered "yes" to question 8.(a) above, provide the location of the <i>real</i>	,	asse	ets:

			ımber and Street 2:	
		WESTLAKE Texas Un	ountry: ZIP+4/Postal Code: 76262	
		If this address is a private residence, check this box: \Box	Yes	. No
9.	(a)	If the <i>related person</i> is an investment adviser, is it exempt fro	m registration?	0
	(b)	If the answer is yes, under what exemption?		
10.		Is the <i>related person</i> registered with a <i>foreign financial regulate</i> If the answer is yes, list the name and country, in English of e	ory authority? each foreign financial regulatory authority with which the related person is registered. No Information Filed	•
11.	Do y	ou and the related person share any supervised persons?	⊙	0
12.	Do y	ou and the related person share the same physical location?	•	0
	TD Al	I Name of <i>Related Person</i> : MERITRADE INVESTMENT MANAGEMENT, LLC ary Business Name of <i>Related Person</i> :		
		MERITRADE INVESTMENT MANAGEMENT, LLC		
3.		ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802- - 55501 er		
4.	(a)	ted Person's CRD Number (if any): 111514 CIK Number(s) (if any):		
			No Information Filed	
5.	(a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l) (m) (n) (o) (p)	broker-dealer, municipal securities dealer, or government other investment adviser (including financial planners) registered municipal advisor registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (including financial planners) registered security-based swap dealer major security-based swap participant commodity pool operator or commodity trading advisor (including final financial planners) succeptable for accounting firm lawyer or the financial planners (including final financial planners) succeptable for accounting firm lawyer or law firm spension consultant real estate broker or dealer sponsor or syndicator of limited partnerships (or equivaled sponsor, general partner, managing member (or equivaled sponsor, general partner, managing member (or equivaled sponsor, general partner, managing member (or equivaled sponsor)	whether registered or exempt from registration) ent), excluding pooled investment vehicles ent) of pooled investment vehicles Yes	; No
6.	Do y	ou control or are you controlled by the related person?	О	•
7.	Are y	you and the related person under common control?	⊙	0
8.	(b)	If you are registering or registered with the SEC and you have presumption that you are not operationally independent (pursuequired to obtain a surprise examination for your <i>clients</i> ' fun	clients in connection with advisory services you provide to clients? The answered "yes," to question 8.(a) above, have you overcome the suant to rule 206(4)-2(d)(5)) from the related person and thus are not ds or securities that are maintained at the related person? The location of the related person's office responsible for custody of your clients' asson Number and Street 2: Country: ZIP+4/Postal Code:	© O ets:
		•	Yes	No

9.	(a) It	f the related person is an investment adviser, is it exempt from registration?	\circ	0
	(b) It	f the answer is yes, under what exemption?		
10.	(a) I:	s the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	œ
		f the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered.		
		No Information Filed		
11.	Do you	u and the related person share any supervised persons?	⊙	C
12.	Do you	u and the <i>related person</i> share the same physical location?	•	C
1.	_	Name of <i>Related Person</i> : NSURANCE AGENCY OF TD AMERITRADE, LLC		
	11112 111	SONAINCE AGENCY OF TO AMERITHADE, LEG		
2.		ry Business Name of <i>Related Person</i> : NSURANCE AGENCY OF TD AMERITRADE, LLC		
	IUCIN	SURANCE AGENCY OF 1D AMERITRADE, LLC		
3.	Relate	ed Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or			
	Other			
4.	Relate	ed Person's		
		CRD Number (if any):		
	(b) C	CIK Number(s) (if any):		
	(5)	No Information Filed		
5.	Relate	ed Person is: (check all that apply)		
	(a) [
	(b) L (c) L			
	(d) [
	(e) [major security-based swap participant		
	(f) [
	(g) L (h) L	_		
	(i) [
	(j) [
	(k) [_		
	(l) [(m) [
	(n) [_ `		
	(o) [
	(p)	*** *** ** ** ** ** ** ** ** ** ** ** *	⁄es	Ni
6.	Do you		0	
7.	Are yo	ou and the <i>related person</i> under common <i>control</i> ?	⊙	C
8.	(a) D	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	•
		f you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the	Ö	
	•	presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?		
		f you have answered "yes" to question 8.(a) above, provide the location of the related person's office responsible for custody of your clients' a	asse	∍ts
		Number and Street 1: Number and Street 2:		
		City: Country: ZIP+4/Postal Code: If this address is a private residence, check this box: Country: ZIP+4/Postal Code: Country: Country		
			⁄es	N
9.	(a) It	f the related person is an investment adviser, is it exempt from registration?	0	C
	(b) It	f the answer is yes, under what exemption?		
10.	(a) I:	s the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ?	0	•
		f the answer is yes, list the name and country, in English of each foreign financial regulatory authority with which the related person is registered		-0
		No Information Filed		

11.	Do y	you and the related person share any supervised persons?	\circ	\odot
12.	Do y	you and the related person share the same physical location?	0	•
	_	al Name of <i>Related Person</i> : RLES SCHWAB, U.K., LIMITED		
		rary Business Name of <i>Related Person</i> : RLES SCHWAB, U.K., LIMITED		
3.	Relai -	ted Person's SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-)		
	or Othe	er		
4.		ted Person's CRD Number (if any):		
	(b)	CIK Number(s) (if any): No Information Filed		
5.	(a) (b)	ted Person is: (check all that apply) ☑ broker-dealer, municipal securities dealer, or government securities broker or dealer ☐ other investment adviser (including financial planners) ☐ registered municipal advisor		
	(e) (f)	 □ registered security-based swap dealer □ major security-based swap participant □ commodity pool operator or commodity trading advisor (whether registered or exempt from registration) □ futures commission merchant 		
	(h) (i)	banking or thrift institution trust company accountant or accounting firm		
		□ lawyer or law firm□ insurance company or agency□ pension consultant		
	` '	real estate broker or dealer		
		sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles sponsor, general partner, managing member (or equivalent) of pooled investment vehicles		
	(ρ)	sponsor, general partner, managing member (or equivalent) or pooled investment venicles	Yes	No
6.	Do y	ou control or are you controlled by the related person?	0	•
7.	Are y	you and the <i>related person</i> under common <i>control</i> ?	•	0
8.	(a)	Does the related person act as a qualified custodian for your clients in connection with advisory services you provide to clients?	0	\odot
	(b)	If you are registering or registered with the SEC and you have answered "yes," to question 8.(a) above, have you overcome the presumption that you are not operationally independent (pursuant to rule 206(4)-2(d)(5)) from the <i>related person</i> and thus are not required to obtain a surprise examination for your <i>clients'</i> funds or securities that are maintained at the <i>related person</i> ?	0	0
	(c)	If you have answered "yes" to question 8.(a) above, provide the location of the <i>related person's</i> office responsible for <i>custody</i> of your <i>clients</i> Number and Street 1: Number and Street 2:	'asse	ets:
		City: State: Country: ZIP+4/Postal Code: If this address is a private residence, check this box:		
			Yes	No
9.		If the <i>related person</i> is an investment adviser, is it exempt from registration?	0	\circ
	(b)	If the answer is yes, under what exemption?		
10.		Is the <i>related person</i> registered with a <i>foreign financial regulatory authority</i> ? If the answer is yes, list the name and country, in English of each <i>foreign financial regulatory authority</i> with which the <i>related person</i> is registered.		0
		Name of Country/English Name of Foreign Financial Regulatory Authority United Kingdom - Financial Conduct Authority		
11.	Do y	you and the related person share any supervised persons?	0	•
		you and the <i>related person</i> share the same physical location?	~	~
	_ J	and the state of t	O	•

Iter	m 7 <i>Private Fund</i> Reporting				
		Ye	s No		
В	Are you an adviser to any <i>private fund</i> ?	0	•		
		~	~		
	If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You instead, complete Section 7.B.(2) of Schedule D.				
	In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alpha code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same co designation in place of the fund's name.		! 		
SEC	TION 7.B.(1) <i>Private Fund</i> Reporting				
	No Information Filed				
SEC	CTION 7.B.(2) <i>Private Fund</i> Reporting				
SEC	7.11 ON 7.B.(2) Frivate Fund Reporting				
	No Information Filed				
Ltor	n 8 Participation or Interest in <i>Client</i> Transactions				
	this Item, we request information about your participation and interest in your <i>clients</i> ' transactions. This information identifies additional areas in	which	h		
con	flicts of interest may occur between you and your <i>clients</i> . Newly-formed advisers should base responses to these questions on the types of partitional flowers in the types of partition of the types of types of the types of the types of the types of types of the types of types of the types of type				
Like	e Item 7, Item 8 requires you to provide information about you and your related persons, including foreign affiliates.				
Pro	oprietary Interest in <i>Client</i> Transactions				
A.	Do you or any related person:	Yes	s No		
	(1) buy securities for yourself from advisory clients, or sell securities you own to advisory clients (principal transactions)?	\odot	\circ		
	(2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory clients?	\odot	\circ		
	(3) recommend securities (or other investment products) to advisory clients in which you or any related person has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))?	•	0		
Sa	les Interest in <i>Client</i> Transactions				
B.	Do you or any related person:	Yes	s No		
	(1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory client securities are sold to or bought from the brokerage customer (agency cross transactions)?	0	•		
	(2) recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?	•	0		
	(3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)?	•	0		
Inv	vestment or Brokerage Discretion				
C.	Do you or any related person have discretionary authority to determine the:	Yes	No No		
	(1) securities to be bought or sold for a <i>client's</i> account?	⊙	\circ		
	(2) amount of securities to be bought or sold for a <i>client's</i> account?	⊙	0		
	(3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?	⊙	0		
	(4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?	•	0		
D.	If you answer "yes" to C.(3) above, are any of the brokers or dealers related persons?	0	0		
E.	Do you or any related person recommend brokers or dealers to clients?	•	0		
F.	If you answer "yes" to E. above, are any of the brokers or dealers related persons?	•	0		
G.	(1) Do you or any related person receive research or other products or services other than execution from a broker-dealer or a third party	•	0		
	("soft dollar benefits") in connection with <i>client</i> securities transactions?	~			
	(2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any related persons receive eligible "research or brokerage services" under	•	0		

ŀ	Ⅎ.	(1)	Do you or any related person, directly or indire	ectly, compensate any person that is not an employee for client referrals?	\odot	0
		(2)	Do you or any <i>related person</i> , directly or indirectly firm (cash or non-cash compensation in a	ectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for addition to the <i>employee's</i> regular salary)?	•	0
		,	ou or any <i>related person</i> , including any <i>emplo</i> y on) for <i>client</i> referrals?	vee, directly or indirectly, receive compensation from any person (other than you or any related	•	0
		In y	our response to Item 8.1., do not include the reg	gular salary you pay to an employee.		
			(in answering Item 8.1.) any person in exchang	ish and non-cash compensation that you or a related person gave to (in answering Item 8.H.) or re ge for client referrals, including any bonus that is based, at least in part, on the number or amount		
			ustody		_	
			nt Company Act of 1940) assets and about yo	on has custody of client (other than clients that are investment companies registered under the our custodial practices.	3	
,	٨.	(1)	Do you have <i>custody</i> of any advisory <i>clients'</i> :		Yes	No
			(a) cash or bank accounts?		\odot	0
			(b) securities?		\odot	0
		dired	etly from your clients' accounts, or (ii) a related p	swer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your adviso person has custody of client assets in connection with advisory services you provide to clients, but perationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.	-	es.
		(2)	If you checked "yes" to Item 9.A.(1)(a) or (b) you have <i>custody</i> :), what is the approximate amount of <i>client</i> funds and securities and total number of <i>clients</i> for	which	า
			U.S. Dollar Amount	Total Number of Clients		
			(a) \$ 285,374,600,902	(b) 717,544		
		inclu conr	de the amount of those assets and the number	If you have custody solely because you deduct your advisory fees directly from your clients' account or of those clients in your response to Item 9.A.(2). If your related person has custody of client assi- cents, do not include the amount of those assets and number of those clients in your response to 9 or Item 9.B.(2).	ets in	,
[3.	(1)	In connection with advisory services you prov (a) cash or bank accounts?	vide to clients, do any of your related persons have custody of any of your advisory clients':	Yes	
			(b) securities?			o ⊚
		You	are required to answer this item regardless of h	ow you answered Item 9.A.(1)(a) or (b).		
		(2)	If you checked "yes" to Item 9.B.(1)(a) or (b) your related persons have custody:	, what is the approximate amount of client funds and securities and total number of clients for	which	n
			U.S. Dollar Amount	Total Number of Clients		
			(a) \$ 7,258,778,434	(b) 395,817		
(-	u or your related persons have custody of clier apply:	nt funds or securities in connection with advisory services you provide to <i>clients</i> , check all the f	ollowi	ing
		(1)	A qualified custodian(s) sends account stater	ments at least quarterly to the investors in the pooled investment vehicle(s) you manage. ally the pooled investment vehicle(s) that you manage and the audited financial statements		
		(3)	An independent public accountant conducts an	annual surprise examination of <i>client</i> funds and securities.	V	
		(4)	An independent public accountant prepares an are qualified custodians for client funds and s	internal control report with respect to custodial services when you or your related persons securities.	V	
		an ir		ection 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or (2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided divise in Section 7.B.(1) of Schedule D).		
I	D.		ou or your <i>related person(s)</i> act as qualified cu	ustodians for your clients in connection with advisory services you provide to clients?		No O

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 \circ

section 28(e) of the Securities Exchange Act of 1934?

(2) your related person(s) act as qualified custodian(s)

If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.

- E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced: 12/2022
- F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?

SECTION 9.C. Independent Public Accountant

You must complete the following information for each *independent public accountant* engaged to perform a surprise examination, perform an audit of a pooled investment vehicle that you manage, or prepare an internal control report. You must complete a separate Schedule D Section 9.C. for each *independent public accountant*.

(1) Name of the *independent public accountant*: DELOITTE & TOUCHE LLP

(2) The location of the independent public accountant's office responsible for the services provided:

Number and Street 1: Number and Street 2:

1601 WEWATTA ST SUITE 400

City: State: Country: ZIP+4/Postal Code:

DENVER Colorado United States 80202-6479

Yes No

(3) Is the independent public accountant registered with the Public Company Accounting Oversight Board?

0

If "yes," Public Company Accounting Oversight Board-Assigned Number:

34

- (4) If "yes" to (3) above, is the *independent public accountant* subject to regular inspection by the Public Company Accounting Oversight Board in accordance with its rules?
 - O

- (5) The independent public accountant is engaged to:
 - A.

 audit a pooled investment vehicle
 - B. perform a surprise examination of *clients'* assets
 - C.

 ✓ prepare an internal control report
- (6) Since your last *annual updating amendment*, did all of the reports prepared by the *independent public accountant* that audited the pooled investment vehicle or that examined internal controls contain unqualified opinions?
 - Yes
 - O No
 - C Report Not Yet Received

If you check "Report Not Yet Received", you must promptly file an amendment to your Form ADV to update your response when the accountant's report is available.

Item 10 Control Persons

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

Yes No

A. Does any person not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, control your management or policies?

O

If yes, complete Section 10.A. of Schedule D.

B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

SECTION 10.A. Control Persons								
You must complete a separate Schedule D Section 10.A. for each <i>control person</i> not named in Item 1.A. or Schedules A, B, or C that directly or indirectly <i>controls</i> your management or policies.								
Individual Name (if applicable) (Last, First, Middle)							
Craig, Jonathan, M								
CRD Number (if any)								
4144656								
Effective Date 02/15/2018	Termination	n Date						
Business Address:								
Number and Street 1		Number and Street 2						
211 MAIN STREET City	State	Country	ZIP+4/Postal Code					
SAN FRANCISCO	California	United States	94105					
If this address is a private resid	lence, check this box:							
Briefly describe the nature of th CONTROLS THE MANAGEMENT O SERVICES.		IT AS A SENIOR EXECUTIVE VICE	PRESIDENT, OVERSEEING INVESTOR SERVICES, ADVISOR					
You must complete a separate S controls your management or po		each control person not named in	Item 1.A. or Schedules A, B, or C that directly or indirectly					
Individual Name (if applicable) (HATHI, NEESHA, K	Last, First, Middle)							
CRD Number (if any) 2648997								
Effective Date 09/01/2017	Termination	n Date						
Business Address:								
Number and Street 1 211 MAIN STREET		Number and Street 2						
City SAN FRANCISCO	State California	Country United States	ZIP+4/Postal Code 94105					
If this address is a private resid	lence, check this box: \Box							
Briefly describe the nature of th CONTROLS THE MANAGEMENT O		IT AS MANAGING DIRECTOR - WEA	ALTH AND ADVISORY SERVICES.					
SECTION 10.B. Control Person	Dublic Poporting Companies							
DECTION TO.B. CONTROL Person	rublic keporting companies							
• .		•	reporting company under Sections 12 or 15(d) of the Securities					

(1) Full legal name of the public reporting company:

THE CHARLES SCHWAB CORPORATION

(2) The public reporting company's CIK number (Central Index Key number that the SEC assigns to each reporting 316709 company):

Item 11 Disclosure Information

company):

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your advisory affiliates. We use this information to

determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the filing adviser and all relying advisers under an umbrella registration. Your advisory affiliates are: (1) all of your current employees (other than employees performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any person performing similar functions); and (3) all persons directly or indirectly controlling you or controlled by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your advisory affiliates are. If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed. You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11. Yes No Do any of the events below involve you or any of your supervised persons? \odot \circ For "yes" answers to the following questions, complete a Criminal Action DRP: A. In the past ten years, have you or any advisory affiliate: Yes No (1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any felony? \circ **(** (2) been charged with any felony? \odot \circ If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.

B.	In the past ten years, have you or any advisory affiliate:		
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	•
	(2) been charged with a misdemeanor listed in Item 11.B.(1)?	\circ	\odot
	If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) charges that are currently pending.	to	
For	"yes" answers to the following questions, complete a Regulatory Action DRP:		
C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:	Yes	No.
	(1) found you or any advisory affiliate to have made a false statement or omission?	\odot	0
	(2) found you or any advisory affiliate to have been involved in a violation of SEC or CFTC regulations or statutes?	\odot	0
	(3) found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) entered an order against you or any advisory affiliate in connection with investment-related activity?	\odot	0
	(5) imposed a civil money penalty on you or any advisory affiliate, or ordered you or any advisory affiliate to cease and desist from any activity?	•	0
D.	Has any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority:		
	(1) ever found you or any advisory affiliate to have made a false statement or omission, or been dishonest, unfair, or unethical?	0	•
	(2) ever found you or any advisory affiliate to have been involved in a violation of investment-related regulations or statutes?	•	0
	(3) ever found you or any advisory affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) in the past ten years, entered an order against you or any advisory affiliate in connection with an investment-related activity?	•	0
	(5) ever denied, suspended, or revoked your or any advisory affiliate's registration or license, or otherwise prevented you or any advisory affiliate, by order, from associating with an investment-related business or restricted your or any advisory affiliate's activity?	•	0
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found you or any advisory affiliate to have made a false statement or omission?	0	•
	(2) found you or any advisory affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation under a plan approved by the SEC):	•	0
	(3) found you or any advisory affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) disciplined you or any advisory affiliate by expelling or suspending you or the advisory affiliate from membership, barring or suspending you or the advisory affiliate from association with other members, or otherwise restricting your or the advisory affiliate's activities?	0	•

Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any advisory affiliate ever been revoked or

suspended?

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•

G.	11.D., or 11.E.?	•	0			
For	r "yes" answers to the following questions, complete a Civil Judicial Action DRP:			-		
Н.	(1) Has any domestic or foreign court:	Yes	s No			
	(a) in the past ten years, enjoined you or any advisory affiliate in connection with any investment-related activity?	•	0			
	(b) ever found that you or any advisory affiliate were involved in a violation of investment-related statutes or regulations?	•	0			
	(c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ?	•	0			
	(2) Are you or any advisory affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of Item 11.H.(1)?	0	•			
				-		
Iter	m 12 Small Businesses					
	e SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determ ether you meet the definition of "small business" or "small organization" under rule 0-7.	ne				
und	swer this Item 12 only if you are registered or registering with the SEC and you indicated in response to Item 5.F.(2)(c) that you have regulatory der management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, and rent state registration, or switching from SEC to state registration.					
For	purposes of this Item 12 only:					
	• Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of <i>clients</i> . In determining your or another <i>person's</i> assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).					
subsidiaries included, if that amount is larger). • Control means the power to direct or cause the direction of the management or policies of a person, whether through ownership of securities, by						

		Yes	No
Α.	Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?	\odot	0
If	"yes," you do not need to answer Items 12.B. and 12.C.		

contract, or otherwise. Any person that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent

- B. Do you:
 (1) control another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?
 (2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?
 C. Are you:
 - (2) control another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?
 Are you:
 (1) controlled by or under common control with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?
 (2) controlled by or under common control with another person (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?

Schedule A

Direct Owners and Executive Officers

- 1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
- 2. Direct Owners and Executive Officers. List below the names of:

or more of the profits, of another person is presumed to control the other person.

- (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
- (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act);

 Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
- (c) if you are organized as a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
- (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
- (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.

- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
- 5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: NA less than 5% B 10% but less than 25% D 50% but less than 75%
 - A 5% but less than 10% C 25% but less than 50% E 75% or more
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Title or Status	Date Title or Status Acquired MM/YYYY	Ownership Code	Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
SCHWAB HOLDINGS, INC.	DE	100% OWNER	01/1983	E	Υ	N	
ARMELI, BARBARA JEAN	I	MANAGING DIRECTOR AND BROKER DEALER CHIEF COMPLIANCE OFFICER	02/2018	NA	Y	N	2029572
CRAWFORD, PETER BROOKS	I	MANAGING DIRECTOR AND CHIEF FINANCIAL OFFICER	05/2017	NA	Y	N	4453142
HOWARD, DENNIS WILLARD	I	MANAGING DIRECTOR AND CHIEF INFORMATION OFFICER	05/2017	NA	N	N	6403083
STARR, JEFFREY HAROLD	I	MANAGING DIRECTOR, OPERATIONAL SERVICES	01/2020	NA	Y	N	4700461
WURSTER, RICHARD A	I	PRESIDENT	10/2021	NA	Υ	N	6638804
NICHOLS, CHARLES	I	MANAGING DIRECTOR AND INVESTMENT ADVISOR CHIEF COMPLIANCE OFFICER	07/2023	NA	Υ	N	4811434

Schedule B

Indirect Owners

- 1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
- 2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
 - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;
 - For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
 - (b) in the case of an owner that is a partnership, <u>all</u> general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
 - (c) in the case of an owner that is a trust, the trust and each trustee; and
 - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
- 3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
- 4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
- 5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
- 6. Ownership codes are: C 25% but less than 50% E 75% or more
 - D 50% but less than 75% F Other (general partner, trustee, or elected manager)
- 7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.
 - (b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.
 - (c) Complete each column.

ш	FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned			• 1	Control Person		CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
	THE CHARLES SCHWAB CORPORATION	DE	SCHWAB HOLDINGS, INC.	SHAREHOLDER	03/1987	E	Υ	Υ	

Schedule D - Miscellaneous

You may use the space below to explain a response to an Item or to provide any other information.

ITEM 7B: CERTAIN OF REGISTRANTS EMPLOYEES ENGAGE IN APPROVED BUSINESS ACTIVITIES OUTSIDE THE FINANCIAL SERVICES FIELD THAT ARE

INDEPENDENT OF REGISTRANT AND ITS BUSINESS, INCLUDING HOLDING OWNERSHIP INTERESTS IN BUSINESS VENTURES WHICH ARE NOT LISTED IN SECTION 7B. SOME OF THESE BUSINESS VENTURES MAY BE ORGANIZED AS LPS OR LLCS AND MAY RELATE TO REAL ESTATE HOLDINGS. REGISTRANT AND CERTAIN OF ITS RELATED PERSONS MAY ACT AS GENERAL PARTNERS TO LPS OR AS MANAGERS OF LLCS FOR OPERATION PURPOSES AND NOT FOR CLIENT INVESTMENT PURPOSES. SUCH LPS AND LLCS, WHICH ARE NOT LISTED IN SECTION 7B, INCLUDING AN ENTITY FORMED TO HOLD THE LEASE FOR A BUILDING USED BY REGISTRANTS EMPLOYEES.
Schedule R
No Information Filed
DRP Pages
CRIMINAL DISCLOSURE REPORTING PAGE (ADV)
No Information Filed
REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)
GENERAL INSTRUCTIONS
This Disclosure Reporting Page (DRP ADV) is an O INITIAL OR O AMENDED response used to report details for affirmative responses to Items 11.C., 11.D., 11.E., 11.F. or 11.G. of Form ADV.

	No Information Filed							
DRP	Pages							
CRI	MINAL DISCLOSURE RE	EPORTING PAGE (ADV)						
No I	nformation Filed							
REG	ULATORY ACTION DIS	CLOSURE REPORTING	PAGE (ADV)					
			GENERAL INSTRUC					
	s Disclosure Reporting Pa E., 11.F. or 11.G. of Form		NITIAL OR	se used to report details for aff	irmative responses to Items 11.C., 11.D.,			
			Regulatory Act	ion				
	ck item(s) being respon		- 11.0(0)	-	5 44 9(5)			
	11.C(1) 11.D(1)	□ 11.C(2) ☑ 11.D(2)	☐ 11.C(3) ☐ 11.D(3)	□ 11.C(4) □ 11.D(4)	□ 11.C(5) □ 11.D(5)			
	11.E(1)	☐ 11.E(2)	□ 11.E(3)	□ 11.E(4)	L 11.D(3)			
	11.F.	□ 11.G.	(0)	2 ()				
One	ne event. If an event giv	re than one affirmative a	answer to Items 11.C., 11.D., 11 re than one regulator, provide de		e DRP to report details related to the arate DRP.			
PAR A.		(ies) for whom this DRP	is being filed is (are):					
	You and one or more	re of your <i>advisory affilia</i>	too					
	One or more of you		tes					
	If this DRP is being file	d for an <i>advisory affiliate</i> ,	, give the full name of the <i>advisol</i> ide that number. If not, indicate		s, Last name, First name, Middle name). The appropriate box.			
	ADV DRP - ADVISORY AFFILIATE							
	No Information Filed							
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.							
	11.D(4), and only if th	•	than ten years ago. If you are re	-	reported only in response to Item e SEC, you may remove a DRP for any			
	☐ This DRP should be circumstances:	removed from the ADV	record because it was filed in err	or, such as due to a clerical or	data-entry mistake. Explain the			

B. If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to

	O Y	Yes V No
	NOTE	E: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PART	11	
1.	_	ulatory Action initiated by: EC Other Federal State O _{SRO} OForeign
		name of regulator, <i>foreign financial regulatory authority</i> , federal, state, or <i>SRO</i>) DRNEY GENERAL ANDREW M. CUOMO, THE STATE OF NEW YORK
2.	Othe Othe	er Sanctions:
		CORGEMENT OF GAINS, PAY DAMAGES, PAY PENALTIES AND COSTS, INJUCTIVE RELIEF.
3.		Initiated (MM/DD/YYYY):
		7/2009 © Exact © Explanation t exact, provide explanation:
4.	Dock	xet/Case Number:
5.	Advis	sory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Princ	sipal Product Type:
	Othe	
		r Product Types: TION RATE SECURITIES
7.		cribe the allegations related to this regulatory action (your response must fit within the space provided): COMPLAINT ALLEGES FRAUD IN CONNECTION WITH THE SALE OF AUCTION RATE SECURITIES.
8.	Curre	ent Status? C Pending C On Appeal G Final
9.	If on	appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If Fi	nal or	r On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How	was matter resolved:
	Settl	led
11.	Reso	lution Date (MM/DD/YYYY):
	02/0	3/2015 © Exact C Explanation
	If no	t exact, provide explanation:
12.	Reso	olution Detail:
	A.	Were any of the following Sanctions Ordered (check all appropriate items)?
		Monetary/Fine Amount: \$
		Revocation/Expulsion/Denial Disgorgement/Restitution
		☐ Censure ☐ Cease and Desist/Injunction ☐ Bar ☐ Suspension
	П	·
		Other Sanctions <i>Ordered</i> : UNDERTAKING Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: ON FEBRUARY 03, 2015 THE NEW YORK ATTORNEY GENERAL ("NYAG") AND SCHWAB ENTERED INTO A SETTLEMENT OF THE NYAG'S AUCTION RAT
		SECURITIES ("ARS") CLAIMS AGAINST SCHWAB. THE SETTLEMENT PROVIDED FOR THE DISMISSAL WITH PREJUDICE OF THE NYAG'S LAWSUIT,

AND SCHWAB AGREEING TO CERTAIN UNDERTAKINGS TO ITS ARS CUSTOMERS.

the IARD or \it{CRD} for the event? If the answer is "Yes," no other information on this DRP must be provided.

13.	Provide a brief summary of det must fit within the space provide		status and (or) disposi	tion and include relevant terms	, conditions and dates (your response
	THE NEW YORK ATTORNEY GENERALE OF CERTAIN AUCTION RATESECTION 63(12) OF NEW YORK C(1)(C); AND (4) VIOLATION OF ENTIRETY FOR FAILURE TO STATES	ERAL ("NYAG") ASSERTS T TE SECURITIES. THE NYAC 'S EXECUTIVE LAW; (2) VI F GBL 349. ON OCTOBER 2 TE A CAUSE OF ACTION. A O REMAINING GBL 352 CL	G'S COMPLAINT AGAINS OLATION OF THE GENE 24TH, 2011 THE TRIAL O AUGUST 27, 2013 THE A LAIMS TO ARS PURCHAS	T SCHWAB ALLEGED FOUR CAU RAL BUSINESS LAW ("GBL") 35 COURT DISMISSED THE NYAG'S PPELLATE COURT AFFIRMED DIS SES BEFORE SEPTEMBER 5, 200	FED INHERENT LIQUIDITY RISKS IN THE SES OF ACTION: (1) VIOLATION OF 2-C(1)(A); (3) VIOLATION OF GBL 352-COMPLAINT AGAINST SCHWAB IN ITS SMISSAL OF THE FIRST AND FOURTH 7. THE NYAG AND SCHWAB THEN FILED SE MOTIONS WERE DECIDED.
			CENEDAL INCEDIA	OTLONG.	
This	Disclosure Reporting Page (DRP	ADV) is an C INITIAL O	GENERAL INSTRUC AMENDED respons		irmative responses to Items 11.C., 11.D.,
	., 11.F. or 11.G. of Form ADV.	O O			
			Dogulaton, Ast	i a m	
Ched	k item(s) being responded to:		Regulatory Act	ion	
	- · · · · · · · · · · · · · · · · · · ·	1.C(2)	□ 11.C(3)	■ 11.C(4)	□ 11.C(5)
1	1.D(1)	1.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
	• •	1.E(2)	□ 11.E(3)	□ 11.E(4)	, ,
	1.F.	• •	(-)	、	
with One	a completed Execution Page.	one affirmative answer to	Items 11.C., 11.D., 11	.E., 11.F. or 11.G. Use only on	te person or entity using one DRP. File e DRP to report details related to the large DRP.
	•	o detions by more than or	re regulator, provide a	etails for each action on a sepe	rate DN .
PART					
A.	The <i>person(s)</i> or entity(ies) for	whom this DRP is being fi	iled is (are):		
	You (the advisory firm)				
	O You and one or more of you	ır advisory affiliates			
	One or more of your advisor				
	auvisor	y anniates			
	If this DRP is being filed for an If the advisory affiliate has a CR	•			, Last name, First name, Middle name). he appropriate box.
	ADV DRP - <i>ADVISORY AFFILIAT</i>	E			
			No Informatio	n Filod	
			NO IIIIOIIIIatio	II i lieu	
		d from the ADV record be egistration with the SEC o	cause: (1) the event or	proceeding occurred more than	vith the adviser. In ten years ago or (2) the adviser is EC and the event was resolved in the
		occurred more than ten	years ago. If you are re	•	reported only in response to Item e SEC, you may remove a DRP for any
	☐ This DRP should be removed circumstances:	d from the ADV record be	cause it was filed in err	or, such as due to a clerical or	data-entry mistake. Explain the
B.	If the <i>advisory affiliate</i> is registe the IARD or <i>CRD</i> for the event?	•	•	-	d a DRP (with Form ADV, BD or U-4) to
	O Yes O No				
	NOTE: The completion of this fo	orm does not relieve the a	advisory affiliate of its ol	oligation to update its IARD or	CRD records.
PART	· II				
1.	Regulatory Action initiated by: O SEC O Other Federal O S	state o _{SRO} O Foreigr	١		
	(Full name of regulator, <i>foreign</i> FINRA	financial regulatory author	rity, federal, state, or S	SRO)	

2.	Principal Sanction: Other Other Sanctions: N/A		
3.	Date Initiated (MM/DD/YYYY):		
	02/01/2012 © Exact C Expla If not exact, provide explanation:		
4.	Docket/Case Number: 2011029760201		
5.	Advisory Affiliate Employing Firm v	when activity occurred which lec	d to the regulatory action (if applicable):
6.	Principal Product Type: No Product Other Product Types:		
7.	THE FIRST TWO CAUSES OF ACTION SCHWAB'S CUSTOMER AGREEMEN CONFLICT WITH AND VIOLATE FIN THAT OTHER NEW LANGUAGE IS SCONSOLIDATE MORE THAN ONE PARTICIPATION OF THE PARTICIPATION	ON IN THE DISCIPLINARY PROCE TS BY WHICH A CUSTOMER WAI RA RULES 2268(D)(1) AND (D)(SCHWAB'S CUSTOMER AGREEME ARTY'S CLAIMS IN ARBITRATION ARBITRATION RULE 12312. IN E	response must fit within the space provided): EEDING AGAINST CHARLES SCHWAB & CO. INC., CHARGE THAT NEW PROVISIONS IN IVES ANY ABILITY TO ASSERT A CLAIM BY MEANS OF A JUDICIAL CLASS ACTION (3) AND NASD RULES 3110(F)(4)(A) AND (4)(C). THE THIRD CAUSE OF ACTION CHARGES ENTS REQUIRING CUSTOMERS TO AGREE THAT ARBITRATORS HAVE NO POWER TO N VIOLATES FINRA RULE 2268(D)(1) AND NASD RULE 3110(F)(4)(A) BY ATTEMPTING TO EACH CAUSE OF ACTION, FINRA ENFORCEMENT ALSO ALLEGED THAT, BY VIRTUE OF THE NRA RULE 2010.
8.	Current Status? C Pending	On Appeal • Final	
9.	If on appeal, regulatory action ap	pealed to (SEC, <i>SRO,</i> Federal o	or State Court) and Date Appeal Filed:
	How was matter resolved: Decision & Order of Offer of Settle Resolution Date (MM/DD/YYYY): 04/24/2014 © Exact © Expla If not exact, provide explanation:	nation	
12.	Resolution Detail:	anctions <i>Ordered</i> (check all appi	ropriato itamo)?
	☐ Monetary/Fine Amount:	\$	
	Revocation/Expulsion/De	enial	☐ Disgorgement/Restitution
	☐ Censure ☐ Bar		Cease and Desist/InjunctionSuspension
	THE FIRM VIOLATED FINRA RECLASS ACTIONS AS AN ALTE MEMBER FIRM AND ITS CUST RULES AND CANNOT BE ENFORM THAT ADJUDICATORS MUST ARBITRATION. FOR VIOLATION OF TAKE CORRECTIVE ACTION OF CUSTOMERS WHOSE AGREEM LIMITATION ON THE POWERS ARBITRATION IN ACCORD WE \$1,318.25. THE FINRA APPEARED FEBRUARY 26, 2013. THE BOWASD RULES AND FOUND THE SANCTIONS. ALSO, ON APRIL	RULES 2268(D)(1) AND (D)(3) AIRNATIVE TO ARBITRATION, EVE FOMER. THE HEARING PANEL CO ORCED. ENFORCEMENT IS FORE ENFORCE AGREEMENTS TO GO ONS IN THE THIRD CAUSE (FINR WHICH INCLUDES REMOVING THE MENTS WERE CREATED OR AMEI SOF FINRA ARBITRATION RULES ALED THE HEARING PANEL'S DIS MARD OF GOVERNORS ISSUED A AT THE ANTI-CONSOLIDATION N L 24, 2014, THE BOARD ACCEPT	WHEREIN THE FIRST TWO CAUSES WERE DISMISSED. THE CAUSES CHARGED THAT ND NASD RULES 3110(F)(4)(A) AND (4)(C) WHICH OPERATE TO PRESERVE JUDICIAL IN WHEN THERE IS A PRE-DISPUTE ARBITRATION AGREEMENT BETWEEN A FINRA DNCLUDED THAT THE FIRM'S NEW LANGUAGE CONFLICTS WITH AND VIOLATES THESE ECLOSED BY THE FEDERAL ARBITRATION ACT AND OTHER DECISIONS WHICH HOLD TO ARBITRATION AND REJECT ANY PUBLIC POLICY EXCEPTION THAT DISFAVORS AR RULES 2010, 2268(D)(1), NASD RULE 3110(F)(4)(A)), THE FIRM IS ORDERED TO HE VIOLATIVE LANGUAGE FROM CUSTOMER AGREEMENTS AND SENDING PROMPTLY TO NOTE WITH THE VIOLATIVE LANGUAGE NOTICE INDICATING THAT THE PRIOR OF EFFECTIVE. THE NOTICE SHOULD REITERATE THAT THE FIRM AGREES TO SEMISSAL OF THE FIRST AND SECOND CAUSES OF THE ACTION TO THE NAC ON DECISION ON APRIL 24, 2014, FINDING THAT THE CLASS ACTION WAIVER VIOLATED WAIVER VIOLATED NASD RULE. THE BOARD REMANDED THE MATTER TO DETERMINE THE DAY OF THE WITHDRAWAL OF THE WAIVER. THE BOARD ALSO AFFIRMS THE

Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal,

ORDER THAT THE FIRM PAY \$1,318.25 IN HEARING COSTS. RELATED CASE 2011029760202.

	Financial Operations Principal, etc.). If requalification requalify/retrain, type of exam required and whether disgorgement or monetary compensation, provide to of penalty was waived: SEE ABOVE.	condition has been	n satisfied. If disposition resulted	in a fine, penalty, restitution,				
13.	 Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided). . 							
	•							
		CENEDAL INCE	HETIONS					
his	his Disclosure Reporting Page (DRP ADV) is an $_{\mathbb{C}}$ INITIAL $_{\mathit{OR}}$ (GENERAL INSTR		rmative responses to Items 11.C., 11.D.,				
1.E	1.E., 11.F. or 11.G. of Form ADV.							
		Regulatory A	Action					
	heck item(s) being responded to:	Ţ,		_				
		11.C(3)	☑ 11.C(4)	☑ 11.C(5)				
		□ 11.D(3) □ 11.E(3)	□ 11.D(4) □ 11.E(4)	□ 11.D(5)				
	□ 11.E(1) □ 11.E(2) □ 11.F. □ 11.G.	□ II.E(3)	L 11.E(4)					
	_ · · · · · ·							
	se a separate DRP for each event or <i>proceeding</i> . The same event in a completed Execution Page.	ent or <i>proceeding</i> r	nay be reported for more than one	e <i>person</i> or entity using one DRP. File				
	one event may result in more than one affirmative answer to Ite ame event. If an event gives rise to actions by more than one		_	•				
AR7	ART I							
۵.	A. The <i>person(s)</i> or entity(ies) for whom this DRP is being filed	d is (are):						
	You (the advisory firm)							
	O You and one or more of your advisory affiliates							
	One or more of your advisory affiliates							
	davisory armates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that num		•	•				
	ADV DRP - ADVISORY AFFILIATE							
		No Informa	tion Filed					
	☐ This DRP should be removed from the ADV record because This DRP should be removed from the ADV record because registered or applying for registration with the SEC or adviser's or advisory affiliate's favor.	use: (1) the event	or <i>proceeding</i> occurred more than	ten years ago or (2) the adviser is				
	If you are registered or registering with a state securities 11.D(4), and only if that event occurred more than ten year event listed in Item 11 that occurred more than ten years	ars ago. If you are	-					
	☐ This DRP should be removed from the ADV record becausircumstances:	ani belif aaw ti eau	error, such as due to a clerical or o	data-entry mistake. Explain the				
В.	B. If the <i>advisory affiliate</i> is registered through the IARD syste the IARD or <i>CRD</i> for the event? If the answer is "Yes," no o	•	_	d a DRP (with Form ADV, BD or U-4) to				
	O Yes O No							
	NOTE: The completion of this form does not relieve the adv	<i>∕isory affiliate</i> of its	obligation to update its IARD or C	CRD records.				
AR	ART II							
1.	1. Regulatory Action initiated by: SEC Other Federal OState OSRO OForeign							
	(Full name of regulator, foreign financial regulatory authority		SRO)					

2.	Principal Sanction: Cease and Desist Other Sanctions:	
3.	Date Initiated (MM/DD/YYYY):	
	06/13/2022 © Exact C Explanation	
	If not exact, provide explanation:	
4.	Docket/Case Number: 3-20897	
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):	
5.	Principal Product Type:	
	No Product	
	Other Product Types:	
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): ON JUNE 13, 2022, SCHWAB AND ITS AFFILIATE CHARLES SCHWAB INVESTMENT ADVISORY, INC. (COLLECTIVELY, "SCHWAB" FOR PURPOSES OF TH MATTER DESCRIPTION ONLY) REACHED AN AGREEMENT WITH THE UNITED STATES SECURITIES AND EXCHANGE COMMISSION ("SEC") TO SETTLE A MATTER RELATED TO HISTORICAL DISCLOSURES AND MARKETING OF THE SCHWAB INTELLIGENT PORTFOLIOS ("SIP") PROGRAM (THE "PROGRAM"). PART OF THE SETTLEMENT, THE SEC FOUND THAT SCHWAB, ALONG WITH ITS FORMER AFFILIATE, SCHWAB WEALTH INVESTMENT ADVISORY, INC., VIOLATED CERTAIN PROVISIONS OF THE INVESTMENT ADVISERS ACT OF 1940, AND THE RULES THEREUNDER, FROM MARCH 2015 TO NOVEMBER 20 THE SEC FOUND THAT SCHWAB MADE FALSE AND MISLEADING STATEMENTS IN FORM ADV PART 2A BROCHURES ABOUT THE CASH ALLOCATIONS IN PROGRAM ACCOUNTS, IN PARTICULAR ABOUT: (1) SCHWAB'S CONFLICT OF INTEREST IN SETTING THE CASH ALLOCATIONS; (2) THE INFLUENCE OF THIS CONFLICT OF INTEREST ON THE SIZE OF THE CASH ALLOCATIONS; AND (3) THE NEGATIVE EFFECT OF THE CASH ALLOCATIONS ON PERFORMA IN PROGRAM ACCOUNTS UNDER MARKET CONDITIONS WHERE OTHER ASSETS SUCH AS EQUITIES OUTPERFORM CASH. THE SEC ALSO FOUND THAT SCHWAB FAILED TO SUFFICIENTLY IMPLEMENT COMPLIANCE POLICIES DESIGNED TO PREVENT THE PUBLICATION OF MISLEADING STATEMENTS. FINALLY, THE SEC FOUND THAT SCHWAB MADE SIMILARLY FALSE AND MISLEADING STATEMENTS IN ADVERTISEMENTS FOR THE PROGRAM.	AS 018
3.	Current Status? C Pending C On Appeal G Final	
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
lf F	Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	. How was matter resolved: Order	
11.	. Resolution Date (MM/DD/YYYY):	
	06/13/2022 © Exact C Explanation	
	If not exact, provide explanation:	
12.	. Resolution Detail:	
	A. Were any of the following Sanctions Ordered (check all appropriate items)?	
	Monetary/Fine Amount: \$ 135,000,000.00	
	Revocation/Expulsion/Denial Disgorgement/Restitution	
	☐ Bar ☐ Suspension	
	B. Other Sanctions Ordered:	
	PREJUDGMENT INTEREST ON DISGORGEMENT; UNDERTAKINGS Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: SCHWAB SHALL CEASE AND DESIST; CENSURED; AGREED TO PAY A \$45,907,541 IN DISGORGEMENT, PRE-JUDGMENT INTEREST OF \$5,629,32 AND A CIVIL PENALTY IN THE AMOUNT OF \$135,000,000.	
12	. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your respons	22
, J.	must fit within the space provided). SCHWAB SUBMITTED OFFERS OF SETTLEMENT ("OFFERS"), WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. AS A RESULT OF THE CONDUCT	
	(1),	

DESCRIBED HEREIN, THE COMMISSION DETERMINED THAT SCHWAB WILLFULLY VIOLATED SECTION 206(2) AND 206(4) OF THE ADVISORS ACT AND RULES 206(4)-1(A)(5) AND 206(4)-7 THEREUNDER. ACCORDINGLY, THE COMMISSION ORDERED THAT SCHWAB: CEASE AND DESIST FROM COMMITTING

OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 206(2) AND 206(4) OF THE ADVISERS ACT AND RULES 206(4)-1(A)(5) AND 206(4)-7 PROMULGATED THEREUNDER AND SHALL COMPLY WITH THE UNDERTAKINGS ENUMERATED IN THE ORDER. AS PART OF THE UNDERTAKINGS, SCHWAB AGREED TO ENGAGE AN INDEPENDENT CONSULTANT TO: (1) REVIEW SCHWAB'S SUPERVISORY, COMPLIANCE AND OTHER POLICIES AND PROCEDURES DESIGNED TO ENSURE THAT SCHWAB'S SCHWAB INTELLIGENT PORTFOLIOS-RELATED DISCLOSURES, ADVERTISING AND MARKETING COMMUNICATIONS COMPLY WITH THE REQUIREMENTS OF THE INVESTMENT ADVISERS ACT OF 1940, AND THE RULES THEREUNDER, AND WITH OTHER APPLICABLE FEDERAL SECURITIES LAWS WITH RESPECT TO THE PROGRAM; (2) SUBMIT A REPORT TO BOTH SCHWAB AND THE SEC DESCRIBING THE INDEPENDENT CONSULTANT'S FINDINGS AND MAKING RECOMMENDATIONS. SCHWAB MAY IDENTIFY ANY RECOMMENDATIONS THAT IT CONSIDERS TO BE UNDULY BURDENSOME, IMPRACTICAL OR INAPPROPRIATE AND ATTEMPT TO REACH AGREEMENT OVER SUCH RECOMMENDATIONS WITH THE INDEPENDENT CONSULTANT, AND SCHWAB MUST ULTIMATELY ADOPT AND IMPLEMENT THE INDEPENDENT CONSULTANT'S FINAL RECOMMENDATIONS.

		GENERAL INSTRU	CTIONS	
This Disclosure Re	eporting Page (DRP ADV) is an 👝 I	NITIAL OR 6 AMENDED respon	se used to report details for aff	irmative responses to Items 11.C., 11.D
11.E., 11.F. or 11.	G. of Form ADV.			
Shock itom(s) hoi	ng responded to:	Regulatory Ac	tion	
□ 11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	✓ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	11.5(0)
□ 11.F.	□ 11.G.	11.2(0)	- 11.2(1)	
vith a completed	Execution Page.			ne <i>person</i> or entity using one DRP. File e DRP to report details related to the
_	event gives rise to actions by mor			
PART I				
·	s) or entity(ies) for whom this DRP advisory firm)	is being filed is (are):		
You and	one or more of your advisory affilian	4		
		tes		
⊙ One of it	ore of your advisory affiliates			
If the <i>adviso</i>	s being filed for an <i>advisory affiliate</i> , ry <i>affiliate</i> has a <i>CRD</i> number, provi	-		, Last name, First name, Middle name). he appropriate box.
CRD Number:	6136817	Γhis <i>advisory affiliate</i> is C a Firm	⊙ an Individual	
Registered	: ⊙ _{Yes} ⊙ _{No}			
Name:	GONG, JEFFREY, EDWARD (For individuals, Last, First,			
	Middle)			
This DRP registere		record because: (1) the event o	r <i>proceeding</i> occurred more thar	with the adviser. In ten years ago or (2) the adviser is EC and the event was resolved in the
11.D(4), and	egistered or registering with a stated only if that event occurred more in Item 11 that occurred more that	than ten years ago. If you are r	•	reported only in response to Item e SEC, you may remove a DRP for any
☐ This DRP circumsta	should be removed from the ADV inces:	record because it was filed in er	ror, such as due to a clerical or	data-entry mistake. Explain the
			-	ed a DRP (with Form ADV, BD or U-4) to
	CRD for the event? If the answer is	s "Yes," no other information on	this DRP must be provided.	
⊙ Yes C		s "Yes," no other information on	this DRP must be provided.	

PART II

0	latory Action initiated by:	- Fancing		
	CC Other Federal OState OSRO			
(Full	name of regulator, foreign financial regulator	ory authority, federal, state, or <i>Sl</i>	RO)	
2. Princ	ipal Sanction:			
Othe	r Sanctions:			
3. Date	Initiated (MM/DD/YYYY):			
	exact C Explanation t exact, provide explanation:			
4. Dock	et/Case Number:			
5. Advis	sory Affiliate Employing Firm when activity o	occurred which led to the regulato	ory action (if applicable):	
6. Princ	ipal Product Type:			
Othe	r Product Types:			
7. Desc	ribe the allegations related to this regulate	ory action (your response must f	it within the space provided):	
8. Curre	ent Status? O Pending O On Appe	eal [©] Final		
9. If on	appeal, regulatory action appealed to (SE	C, <i>SRO</i> , Federal or State Court) a	and Date Appeal Filed:	
If Final or	On Appeal, complete all items below. For	Pending Actions, complete Item	13 only.	
10. How	was matter resolved:			
11. Reso	lution Date (MM/DD/YYYY):			
0 -	Exact C Explanation			
	t exact, provide explanation:			
12 Reso	lution Detail:			
	Were any of the following Sanctions Order	rod (chock all appropriate items)?		
A.		ed (check all appropriate items):		
	Monetary/Fine Amount: \$	_	,	
	Revocation/Expulsion/Denial		Disgorgement/Restitution	
	Censure		Cease and Desist/Injunction	
	□ Bar		Suspension	
B.	Other Sanctions Ordered:			
	Sanction detail: if suspended, enjoined or Financial Operations Principal, etc.). If req requalify/retrain, type of exam required ar disgorgement or monetary compensation, of penalty was waived:	ualification by exam/retraining w nd whether condition has been s	as a condition of the sanction, atisfied. If disposition resulted	provide length of time given to in a fine, penalty, restitution,
	de a brief summary of details related to th	ne action status and (or) disposit	ion and include relevant terms	, conditions and dates (your response
must	fit within the space provided).			
This Disclo	osure Reporting Page (DRP ADV) is an $_{ m C}$ II	GENERAL INSTRUC		irmative responses to Items 11 C 11 D
	F. or 11.G. of Form ADV.	OR OR MINICIPLE TESPONS	e useu to report details for all	irmative responses to items Tr.C., Tr.D.,
		Regulatory Acti	on	
Check iten	n(s) being responded to:			
□ 11.C(1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
□ 11.D(1	D 11.D(2)	□ 11.D(3)	▼ 11.D(4)	□ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	

\square 1	1.F. □ 11.G.
	a separate DRP for each event or <i>proceeding</i> . The same event or <i>proceeding</i> may be reported for more than one <i>person</i> or entity using one DRP. File a completed Execution Page.
	event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.
PART	
Α.	The <i>person(s)</i> or entity(ies) for whom this DRP is being filed is (are):
	O You (the advisory firm)
	O You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	CRD 3001219 Number: Registered: • Yes • No
	Name: BOCCIO, BRIAN, JAMES
	(For individuals, Last, First, Middle)
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	• Yes • No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PART	
	Regulatory Action initiated by: O SEC Other Federal O State O SRO O Foreign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)
2.	Principal Sanction:
	Other Sanctions:
3.	Date Initiated (MM/DD/YYYY):
	C Exact C Explanation
	If not exact, provide explanation:
4.	Docket/Case Number:
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type:
	Other Product Types:

7. Descri	be the allegations related to this regular	ory action (your response must in	t within the space provided).	
8. Curren	t Status? O Pending O On App	eal ^O Final		
9. If on a	ppeal, regulatory action appealed to (SE	EC, <i>SRO</i> , Federal or State Court) a	nd Date Appeal Filed:	
If Final or (On Appeal, complete all items below. For	Pending Actions, complete Item 1	3 only.	
10. How w	as matter resolved:			
11. Resolu	tion Date (MM/DD/YYYY):			
O Ex	act C Explanation			
If not e	exact, provide explanation:			
12. Resolu	tion Detail:			
A. W	ere any of the following Sanctions Orde	ered (check all appropriate items)?		
1	Monetary/Fine Amount: \$			
ſ	Revocation/Expulsion/Denial		Disgorgement/Restitution	
	Censure		Cease and Desist/Injunction	1
1	Bar		Suspension	
B. O	ther Sanctions Ordered:			
re d o 13. Provide	inancial Operations Principal, etc.). If receptuality/retrain, type of exam required a isgorgement or monetary compensation f penalty was waived: e a brief summary of details related to the summary of details	and whether condition has been sa , provide total amount, portion le	itisfied. If disposition resulted vied against you or an <i>adviso</i>	d in a fine, penalty, restitution, ry affiliate, date paid and if any portion
must f	it within the space provided).			
This Disclosi	ure Reporting Page (DRP ADV) is an 🙇 L	GENERAL INSTRUCT		firmative responses to Items 11.C., 11.D
	or 11.G. of Form ADV.	OR G		
		Regulatory Action	on.	
Check item(s) being responded to:	Regulatory Activ	J11	
□ 11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
□ 11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	☑ 11.D(5)
□ 11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 11.F.	□ 11.G.			
•	ate DRP for each event or <i>proceeding</i> . T pleted Execution Page.	The same event or <i>proceeding</i> may	be reported for more than or	ne <i>person</i> or entity using one DRP. File
	nay result in more than one affirmative a . If an event gives rise to actions by mo		•	•
PART I				
•	rson(s) or entity(ies) for whom this DRP (the advisory firm)	is being filed is (are):		
O You	and one or more of your advisory affilia	tes		
	e or more of your advisory affiliates			
	DRP is being filed for an <i>advisory affiliate,</i> advisory affiliate has a CRD number, prov			
ADV D	PRP - ADVISORY AFFILIATE			

	Number:	
	Registered: • Yes O No	
	Name: SHUPE, EDWARD, DALE (For individuals, Last, First, Middle)	
	wilddie)	
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the a registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resol adviser's or <i>advisory affiliate's</i> favor.	
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a E event listed in Item 11 that occurred more than ten years ago.	
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain circumstances:	n the
B.	the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.	D or U-4) to
	● Yes ・ No	
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.	
PAR	RT II	
1.		
	© SEC © Other Federal © State © _{SRO} © Foreign (Full name of regulator, <i>foreign financial regulatory authority</i> , federal, state, or <i>SRO</i>)	
2.		
	Other Sanctions:	
3.	Date Initiated (MM/DD/YYYY):	
	C Exact C Explanation	
	If not exact, provide explanation:	
4.	Docket/Case Number:	
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):	
6.	Principal Product Type:	
	Other Product Types:	
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):	
8.	Current Status? C Pending C On Appeal C Final	
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:	
If F	Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.	
10.	D. How was matter resolved:	
11.	1. Resolution Date (MM/DD/YYYY):	
	C Exact C Explanation	
	If not exact, provide explanation:	
12.	2. Resolution Detail:	

A. Were any of the following Sanctions *Ordered* (check all appropriate items)?

This advisory affiliate is O a Firm o an Individual

CRD

2152986

	IVIO	netary/rine Amount. •			
	Rev	vocation/Expulsion/Denial		Disgorgement/Restitution	
Censure		nsure		Cease and Desist/Injunction	1
	Bar	-		■ Suspension	
	B. Other S	Sanctions <i>Ordered:</i>			
	Financi requali disgorg	al Operations Principal, etc.). If fy/retrain, type of exam required	requalification by exam/retrainin d and whether condition has bee	g was a condition of the sanction in satisfied. If disposition resulted	
13.		ief summary of details related thin the space provided).	o the action status and (or) disp	osition and include relevant term	s, conditions and dates (your response
			GENERAL INSTR	DUCTIONS	
Γhis	Disclosure Re	eporting Page (DRP ADV) is an			firmative responses to Items 11.C., 11.D
		G. of Form ADV.	OR S		
. <u> </u>	, II.F. OI II.	G. OF FORM ADV.			
			Regulatory A	Action	
Che	ck item(s) bei	ing responded to:			
	11.C(1)	□ 11.C(2)	□ 11.C(3)	■ 11.C(4)	□ 11.C(5)
	11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	☑ 11.D(5)
	11.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)	. ,
	11.F.	□ 11.G.	X-7		
PAR		l event gives rise to actions by i	nore than one regulator, provide	e details for each action on a sep	arate DRP.
Α.	,	s) or entity(ies) for whom this Dadvisory firm)	RP is being filed is (are):		
	O You and	one or more of your advisory aff	iliates		
	One or m	nore of your advisory affiliates			
			_	isory affiliate below (for individual ate "non-registered" by checking	s, Last name, First name, Middle name). the appropriate box.
	ADV DRP - A	ADVISORY AFFILIATE			
	CRD	5169074	This <i>advisory affiliate</i> is ^O a Fi	rm © an Individual	
	Number:		-		
	Registered	: • Yes • No			
	Name:	McClain, Andrew, Bradley (For individuals, Last, First, Middle)			
	This DRP registere adviser's	should be removed from the AL should be removed from the AL d or applying for registration with a segistered or registering with a segistering with	OV record because: (1) the event the the SEC or reporting as an executate securities authority, you may	<i>sempt reporting adviser</i> with the S by remove a DRP for an event you	with the adviser. In ten years ago or (2) the adviser is EC and the event was resolved in the In reported only in response to I tem The SEC, you may remove a DRP for any
	event listed	in Item 11 that occurred more	than ten years ago.	error, such as due to a clerical or	
	circumsta	ances:			
R	If the adviso	ry affiliate is registered through	the LARD system or CRD system	has the advisory affiliate submitte	ad a DRP (with Form ADV RD or II-1) to

the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

	⊙ Yes ○ No					
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.					
PAR ⁻	7 11					
1.	Regulatory Action initiated by: O SEC Other Federal O State O SRO O Foreign					
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)					
2.	Principal Sanction:					
	Other Sanctions:					
3.	Date Initiated (MM/DD/YYYY):					
	C Exact C Explanation If not exact, provide explanation:					
4.	Docket/Case Number:					
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):					
6.	Principal Product Type:					
	Other Product Types:					
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):					
8.	Current Status? C Pending C On Appeal C Final					
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:					
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.					
10.	How was matter resolved:					
11.	Resolution Date (MM/DD/YYYY):					
	C Exact C Explanation					
	If not exact, provide explanation:					
12.	Resolution Detail:					
	A. Were any of the following Sanctions Ordered (check all appropriate items)?					
	☐ Monetary/Fine Amount: \$					
	Revocation/Expulsion/Denial Disgorgement/Restitution					
	☐ Censure ☐ Cease and Desist/Injunction					
	☐ Bar ☐ Suspension					
	B. Other Sanctions <i>Ordered:</i>					
	Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived:					
13.	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).					

			Regulatory Actio	า		
	ck item(s) being responded	I to:				
1	1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	☐ 11.C(5)	
□ 1	1.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)	
1	1.E(1)	□ 11.E(2)	□ 11.E(3)	□ 11.E(4)		
1	1.F.	☑ 11.G.				
with One	a completed Execution Page	ge. :han one affirmative a	nswer to Items 11.C., 11.D., 11.E	., 11.F. or 11.G. Use only o	one <i>person</i> or entity using one DRP. File one DRP to report details related to the	
	-	rise to actions by more	e than one regulator, provide deta	ails for each action on a sep	oarate DRP.	
PART) (
Α.	The person(s) or entity(ies You (the advisory firm)		s being filed is (are):			
	C You and one or more of		es			
	One or more of your ac	dvisory affiliates				
	•	•	give the full name of the <i>advisory</i> de that number. If not, indicate "r		als, Last name, First name, Middle name). g the appropriate box.	
	ADV DRP - ADVISORY AFF	ILIATE				
			No Information	Filed		
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor. If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any					
	event listed in Item 11 th ☐ This DRP should be rer circumstances:		-	, such as due to a clerical o	or data-entry mistake. Explain the	
B.	_	•	IARD system or <i>CRD</i> system, has "Yes," no other information on th	•	ted a DRP (with Form ADV, BD or U-4) to	
		this form does not reli	eve the <i>advisory affiliate</i> of its obli	gation to update its IARD or	r <i>CRD</i> records.	
PART	ТΗ					
1.	Regulatory Action initiated SEC Other Federal (Full name of regulator, for MASSACHUSETTS SECURIT	State O SRO (oForeign Pry authority, federal, state, or <i>SRC</i>))		
2.	Principal Sanction:					
	Other Sanctions:					
3.	Date Initiated (MM/DD/YYY	Y):				
	07/21/2021 © Exact C If not exact, provide expla	'				
4.	Docket/Case Number: E-2021-0036					
5.	Advisory Affiliate Employing	g Firm when activity o	ccurred which led to the regulator	y action (if applicable):		

6. Principal Product Type:

	No Product Other Product Types:							
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): "THE DIVISION ALLEGES THAT SCHWAB ENGAGED IN UNETHICAL AND DECEPTIVE ACTS AND PRACTICES BY: (1) FAILING TO HAVE IN PLACE ANY POLICIES OR PROCEDURES TO MONITOR ADEQUATELY ACCOUNTS ON ITS PLATFORM FOR PAYMENTS TO FORMER UNREGISTERED INVESTMENT ADVISERS AND INVESTMENT ADVISER REPRESENTATIVES, AND (2) ENABLING AN UNREGISTERED ADVISER TO RECEIVE PAYMENT FOR ITS UNLAWFUL SERVICES INCLUDING PAYMENTS FROM DEPOSITORY ACCOUNTS AFFILIATED WITH SCHWAB IN VIOLATION OF THE MASSACHUSETTS UNIFORM SECURITIES ACT AND REGULATIONS."							
8.	Current Status? © Pending © On Appea	al C Final						
9.	If on appeal, regulatory action appealed to (SEC	C, SRO, Federal or State Court)	and Date Appeal Filed:					
lf F	Final or On Appeal, complete all items below. For P	ending Actions, complete Item	13 only.					
10.	. How was matter resolved:							
11.	. Resolution Date (MM/DD/YYYY):							
	C Exact C Explanation							
	If not exact, provide explanation:							
12.	. Resolution Detail:							
	A. Were any of the following Sanctions Ordered	ed (check all appropriate items)	?					
	☐ Monetary/Fine Amount: \$							
	☐ Revocation/Expulsion/Denial	I	Disgorgement/Restitution					
	☐ Censure	I	Cease and Desist/Injunction					
	□ Bar	I	Suspension					
	B. Other Sanctions Ordered:							
	Sanction detail: if suspended, enjoined or be Financial Operations Principal, etc.). If required requalify/retrain, type of exam required and disgorgement or monetary compensation, of penalty was waived:	alification by exam/retraining of whether condition has been	was a condition of the sanction, satisfied. If disposition resulted	provide length of time given to in a fine, penalty, restitution,				
13.	. Provide a brief summary of details related to the must fit within the space provided).	e action status and (or) dispos	tion and include relevant terms	, conditions and dates (your resp	onse			
	THE MATTER WAS TRIED BEFORE A PRESIDING O CONCLUSIONS OF LAW AND THEN AWAIT THE PR		PARTIES WILL SUBMIT PROPOS	ED FINDINGS OF FACT AND				
		GENERAL INSTRU						
	s Disclosure Reporting Page (DRP ADV) is an $_{f C}$ INE., 11.F. or 11.G. of Form ADV.	ITIAL OR 6 AMENDED respon	se used to report details for aff	irmative responses to Items 11.C	., 11.D.,			
		Dogulatory As	tion					
Che	eck item(s) being responded to:	Regulatory Ac	uon					
	11.C(1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)				
	11.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)				
	11.E(1) ☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)					
	11.F. □ 11.G.							
	a separate DRP for each event or <i>proceeding</i> . The a completed Execution Page.	e same event or <i>proceeding</i> ma	ly be reported for more than or	e <i>person</i> or entity using one DRP.	. File			
	e event may result in more than one affirmative ar ne event. If an event gives rise to actions by more		-	·	the			
PAR [*]	T I							

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

You (the advisory firm)

	C You and one or more of your advisory affiliates							
	One or more of your advisory affiliates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.							
	ADV DRP - ADVISORY AFFILIATE							
	No Information Filed							
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.							
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.							
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:							
3.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP must be provided. O Yes O No							
	Yes V No							
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.							
4R1								
١.	Regulatory Action initiated by:							
	© SEC © Other Federal © State © SRO © Foreign (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO)							
	CHICAGO BOARD OPTIONS EXCHANGE, INC.							
2.	Principal Sanction:							
	Other Sanctions:							
3.	Date Initiated (MM/DD/YYYY):							
	01/04/2013 © Exact C Explanation							
	If not exact, provide explanation:							
1.	Docket/Case Number: FILE NO. 12-0137							
<u>.</u>	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):							
<u>.</u>	Principal Product Type:							
<i>,</i>	Options							
	Other Product Types: COMMON STOCK							
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE CBOE ALLEGES THAT FROM APPROXIMATELY NOVEMBER 8, 2011 THOUGH APPROXIMATELY DECEMBER 7, 2011, SCHWAB FAILED TO HAVE ADEQUATE SUPERVISORY PROCEDURES TO ASSURE COMPLIANCE WITH THE SEC RULE 14E-4 RELATING TO PARTIAL SHORT TENDER ACTIVITY.							
3.	Current Status? C Pending C On Appeal G Final							
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:							
fF	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.							
10.	How was matter resolved: Settled							

11.	Resolution Date (MM/DD/YYYY):							
	05/29/2013 © Exact C Explanation							
	If no	t exact, provide e.	xplanation:					
12.	Resc	olution Detail:						
			following Sanctions <i>Orde</i>	red (check all appropriate iter	ms)?			
		-	e Amount: \$ 10,000.00		•			
		Revocation/E			☐ Disgorgement/Restitution			
		☑ Censure	Apareter Deman		☐ Cease and Desist/Injunction			
		☐ Bar			☐ Suspension			
	B.	Other Sanctions	Ordered:					
		CENSURE AND FIT Sanction detail: if Financial Operation requalify/retrain, disgorgement or of penalty was w	NE OF \$10,000.00 f suspended, <i>enjoined</i> or ons Principal, etc.). If req type of exam required an monetary compensation,	jualification by exam/retrainir nd whether condition has bed	ng was a condition of the sanction, en satisfied. If disposition resulted			
13.	must CHAI	t fit within the spa	ce provided).			s, conditions and dates (your response ER ADMITTED NOR DENIED THE ALLEGED		
				GENERAL INST	DUCTIONS			
his	Disclo	osure Reporting Pa	age (DRP ADV) is an 👝 I			firmative responses to Items 11.C., 11.D		
		F. or 11.G. of Form		UR ·	·	·		
	,							
.,				Regulatory	Action			
		m(s) being respon	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)		
	1.C(1		• ,	, ,	□ 11.C(4) □ 11.D(4)	□ 11.C(5) □ 11.D(5)		
	1.D(1		☐ 11.D(2)	□ 11.D(3)	. ,	L 11.D(5)		
	1.E(1)	▼ 11.E(2)	☐ 11.E(3)	□ 11.E(4)			
	1.F.		□ 11.G.					
vith One	a cor	mpleted Execution t may result in mo	Page.	answer to Items 11.C., 11.D.		ne <i>person</i> or entity using one DRP. File e DRP to report details related to the arate DRP.		
ART	1							
A.		<i>person(s)</i> or entity ou (the advisory fi	v(ies) for whom this DRP irm)	is being filed is (are):				
	o Y	ou and one or mo	re of your <i>advisory affilia</i> i	tes				
	One or more of your advisory affiliates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.							
	ADV DRP - ADVISORY AFFILIATE							
				No Informa	ation Filed			
	T re a	his DRP should be egistered or apply dviser's or <i>advisor</i>	removed from the ADV in the registration with the ry affiliate's favor.	record because: (1) the even the SEC or reporting as an e	xempt reporting adviser with the SE	with the adviser. In ten years ago or (2) the adviser is EC and the event was resolved in the reported only in response to Item		
	-	•				e SEC, you may remove a DRP for any		

event listed in Item 11 that occurred more than ten years ago.

	☐ This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:				
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.				
	C Yes C No				
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.				
PAR	т				
1.					
	SEC Other Federal OState SRO OF or eign (Full name of regulator, for eign financial regulatory authority, federal, state, or SRO) CHICAGO BOARD OPTIONS EXCHANGE, INCORPORATED				
2.	Principal Sanction:				
	Censure Other Senstions:				
	Other Sanctions: \$10,000 FINE AND AN UNDERTAKING TO ENHANCE WRITTEN SUPERVISORY PROCEDURES.				
3.	Date Initiated (MM/DD/YYYY):				
	03/25/2013 © Exact © Explanation If not exact, provide explanation:				
4.	Docket/Case Number: FILE NO. 13-0021				
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):				
6.	Principal Product Type: No Product Other Product Types:				
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE CBOE ALLEGES IN OR ABOUT NOVEMBER 2011, (1) SCHWAB VIOLATED EXCHANGE RULE 9.21, IN THAT SCHWAB DISSEMINATED SALES LITERATURE AND FAILED TO WITHHOLD THE SALES LITERATURE FROM CIRCULATION PRIOR TO INCORPORATING THE REQUIRED CHANGES SPECIFIED BY THE EXCHANGE AND (2) SCHWAB VIOLATED EXCHANGE RULE 4.2 IN THAT SCHWAB FAILED TO ADEQUATELY SUPERVISE ITS ASSOCIATED PERSONS TO ASSURE COMPLIANCE WITH EXCHANGE RULE 9.21(C) IN THAT THE SALES LITERATURE WAS DISSEMINATED PRIOR TO INCORPORATING THE REQUIRED CHANGES SPECIFIED BY THE EXCHANGE.				
8.	Current Status? Pending On Appeal Final				
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:				
If F	Final or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.				
10.	How was matter resolved:				
	Settled				
11.	Resolution Date (MM/DD/YYYY):				
	05/29/2013				
	If not exact, provide explanation:				
12.	Resolution Detail:				
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?				
	✓ Monetary/Fine Amount: \$ 10,000.00				
	Revocation/Expulsion/Denial Disgorgement/Restitution				
	☐ Bar ☐ Suspension				
	B. Other Sanctions Ordered:\$10,000 FINE AND AN UNDERTAKING TO ENHANCE WRITTEN SUPERVISORY PROCEDURES.				

Sanction detail: if suspended, *enjoined* or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an *advisory affiliate*, date paid and if any portion of penalty was waived:

\$10,000 FINE AND AN UNDERTAKING TO ENHANCE WRITTEN SUPERVISORY PROCEDURES.

13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).

CHARLES SCHWAB & CO., INC., WAS CENSURED AND FINED \$10,000.00 AND SHALL ENHANCE ITS WRITTEN SUPERVISORY PROCEDURES TO REQUIRE REVIEW AND APPROVAL OF THE FINAL DRAFT OF OPTIONS COMMUNICATIONS BY A REGISTERED OPTIONS PRINCIPAL AND TO CONDUCT TRAINING OF ALL EMPLOYEES WHO HAVE RESPONSIBILITIES CONCERNING OPTIONS COMMUNICATIONS REVIEW AND PUBLICATION. THE SUPERVISORY PROCEDURES SHALL BE SUBMITTED TO THE EXCHANGE WITHIN 60 CALENDAR DAYS FROM THE ISSUANCE OF THE DECISION. CHARLES SCHWAB & CO., INC., NEITHER ADMITTED NOR DENIED THE ALLEGED VIOLATIONS.

			GENERAL INSTRUC	TIONS					
his	s Disclosure Reporting	g Page (DRP ADV) is an 👩 I	NITIAL OR O AMENDED respons	se used to report details for aff	Firmative responses to Items 11.C., 11.E				
1.E	E., 11.F. or 11.G. of Fo	orm ADV.							
			De mulatam Ast						
:he	ck item(s) being res	ponded to:	Regulatory Act	ion					
	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)				
	11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)				
	11.E(1)	▼ 11.E(2)	□ 11.E(3)	□ 11.E(4)					
	11.F.	□ 11.G.							
vith One	a completed Execut	tion Page. more than one affirmative a	, ,	.E., 11.F. or 11.G. Use only on	ne <i>person</i> or entity using one DRP. File e DRP to report details related to the arate DRP.				
AR	T I								
Α.		tity(ies) for whom this DRP	is being filed is (are):						
	You (the advisor	ry firm)							
	C You and one or	more of your	tos						
		One or more of your advisory affiliates							
	O one or more or	One or more of your advisory affiliates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.								
	ADV DRP - ADVISO	PRY AFFILIATE							
			No Informatio	n Filed					
	☐ This DRP should registered or ap	be removed from the ADV		proceeding occurred more than	with the adviser. In ten years ago or (2) the adviser is EC and the event was resolved in the				
	11.D(4), and only i		than ten years ago. If you are re	•	reported only in response to Item e SEC, you may remove a DRP for any				
	☐ This DRP should circumstances:	be removed from the ADV	record because it was filed in err	or, such as due to a clerical or	data-entry mistake. Explain the				

B. If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to

NOTE: The completion of this form does not relieve the *advisory affiliate* of its obligation to update its IARD or *CRD* records.

the IARD or *CRD* for the event? If the answer is "Yes," no other information on this DRP must be provided.

O Yes O No

2.	O SEC O Other Federal O State SRO O Foreign (Full name of regulator, foreign financial regulatory authority, FINRA	federal, state, or <i>SRO</i>)					
	Principal Sanction: Censure						
	Other Sanctions:						
3.	Date Initiated (MM/DD/YYYY):						
	08/23/2013 © Exact C Explanation If not exact, provide explanation:						
	Docket/Case Number: 20110289412-01						
5.	dvisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):						
	Principal Product Type: Other						
	Other Product Types: UNSPCIFIED SECURITIES						
	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE FIRM FAILED ON 44 OCCASIONS DURING 2ND QUARTER 2011 AND ON 245 OCCASSIONS DURING 1 HALF OF THE 2012 REVIEW PERIOD TO PROVIDE WRITTEN NOTIFICATION DISCLOSING TO ITS CUSTOMERS A CALL DATE THAT WAS CONSISTENT WITH THE DISCLOSED YIELD TO CALL IN VIOLATION OF SEC RULE 10B-10.						
3.	Current Status? C Pending C On Appeal 6 Final						
9.	If on appeal, regulatory action appealed to (SEC, SRO, Fede	eral or State Court) and Date Appeal Filed:					
f Fi	nal or On Appeal, complete all items below. For Pending Acti	ons, complete Item 13 only.					
10.	How was matter resolved:						
	Acceptance, Waiver & Consent(AWC)						
11.	Resolution Date (MM/DD/YYYY):	esolution Date (MM/DD/YYYY):					
	8/23/2013 © Exact C Explanation						
	If not exact, provide explanation:						
12.	esolution Detail:						
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?						
	✓ Monetary/Fine Amount: \$ 12,500.00						
	Revocation/Expulsion/Denial	\square Disgorgement/Restitution					
	✓ Censure	Cease and Desist/Injunction					
	☐ Bar	☐ Suspension					
	B. Other Sanctions <i>Ordered:</i>						
	Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: WITHOUT ADMITTING OR DENYING THE FINDINGS, CHARLES SCHWAB & CO., INC. CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS.						
	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).						

This Disclosure Reporting Page (DRP ADV) is an . INITIAL OR . AMENDED response used to report details for affirmative responses to Items 11.C., 11.D.,								
11.E	, 11.F. or 11.G. of Form	ADV.						
Regulatory Action								
Chec	ck item(s) being respond	ded to:	Regulatory Acti	OH				
	1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)			
1	1.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)			
	1.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)				
	1.F.	□ 11.G.	V -7					
	a separate DRP for each a completed Execution	,	The same event or <i>proceeding</i> may	be reported for more than or	ne <i>person</i> or entity using one DRP. File			
	•		answer to Items 11.C., 11.D., 11. re than one regulator, provide de	-	e DRP to report details related to the arate DRP.			
PAR1	ГΙ							
A.	The <i>person(s)</i> or entity(ies) for whom this DRP is being filed is (are): The person(s) or entity(ies) for whom this DRP is being filed is (are):							
	O You and one or mor	e of your <i>advisory affilia</i>	tes					
	One or more of your advisory affiliates							
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.							
ADV DRP - ADVISORY AFFILIATE								
This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was adviser's or <i>advisory affiliate's</i> favor.								
	11.D(4), and only if the	9	_	reported only in response to Item e SEC, you may remove a DRP for any				
	☐ This DRP should be circumstances:	data-entry mistake. Explain the						
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.							
	C Yes C No							
	NOTE: The completion	of this form does not rel	lieve the <i>advisory affiliate</i> of its ob	ligation to update its IARD or	CRD records.			
PART	ГП							
1.	Regulatory Action initia	ted by: ral O State © <i>SRO</i>	C Foreign					
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FINRA							
2.	Principal Sanction: Censure Other Sanctions:							
3.	Date Initiated (MM/DD/	YYYY):						
		12/18/2013 © Exact C Explanation						
	12/18/2013 Exact Explanation If not exact, provide explanation:							
4.	Docket/Case Number:							
	2011029074302							

5. Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):

IN RE 8. Cu 9. If If Fina 10. Ho Ac 11. Re	Describe the allegations related to this regulato N VIOLATION OF FINRA RULES 2010 AND 3310(REASONABLY DESIGNED TO DETECT AND CAUSE Current Status? O Pending On Appearance of the original of the original or on Appearance of the original original or on Appearance of the original origi	A), CHARLES SCHWAB & CO., THE REPORTING OF SUSPICIO al	INC. FAILED TO IMPLEMENT POLI OUS INCOMING WIRE TRANSACTION	
9. If If Fina 10. Ho Ad 11. Re	f on appeal, regulatory action appealed to (SEC all or On Appeal, complete all items below. For For How was matter resolved: Acceptance, Waiver & Consent(AWC) Resolution Date (MM/DD/YYYY):	C, <i>SRO,</i> Federal or State Court	•	
If Fina 10. Ho Ad 11. Re	al or On Appeal, complete all items below. For F How was matter resolved: Acceptance, Waiver & Consent(AWC)		•	
10. Ho Ad 11. Re	How was matter resolved: Acceptance, Waiver & Consent(AWC) Resolution Date (MM/DD/YYYY):	Pending Actions, complete Iten	n 13 only.	
Ac 11. Re 12	Acceptance, Waiver & Consent(AWC) Resolution Date (MM/DD/YYYY):			
11. R€ 12	Resolution Date (MM/DD/YYYY):			
12				
	2/18/2013 © Exact C Explanation			
lf	f not exact, provide explanation:			
12. R	Resolution Detail:			
Δ	A. Were any of the following Sanctions <i>Order</i>	ed (check all appropriate items)?	
	✓ Monetary/Fine Amount: \$ 175,000.00			
	☐ Revocation/Expulsion/Denial		☐ Disgorgement/Restitution	
	☑ Censure		Cease and Desist/Injunction	
	□ Bar		Suspension	
13. Pr	B. Other Sanctions Ordered: UNDERTAKING Sanction detail: if suspended, enjoined or k Financial Operations Principal, etc.). If requ requalify/retrain, type of exam required an disgorgement or monetary compensation, of penalty was waived: WITHOUT ADMITTING OR DENYING THE FIN THEREFORE, SCHWAB WAS CENSURED, FIN AML POLICIES, SYSTEMS, PROCEDURES (W INCOMING WIRE TRANSFERS. WITHIN 180 THE FIRM HAS ENGAGED IN THE REVIEW AI ADDRESS AND CORRECT THE VIOLATIONS THE TIME OF THE CERTIFICATION, THE FIRM RULE 3310.	lalification by exam/retraining d whether condition has been provide total amount, portion IDINGS, SCHWAB CONSENTED IED \$175,000 AND REQUIRED RITTEN OR OTHERWISE), AND DAYS OF THE ACCEPTANCE OF ND AS OF THE DATE OF THE CIN THE AWC. THE CERTIFICATION SHALL PROVIDE FINRA WITH	was a condition of the sanction, satisfied. If disposition resulted levied against you or an <i>advisor</i> TO THE DESCRIBED SANCTIONS TO CONDUCT A COMPREHENSIVE TRAINING WITH RESPECT TO DE THE AWC, A FIRM OFFICER SHALERTIFICATION, THE FIRM HAS IN ON SHALL BE ACCOMPANIED BY A COPY OF ITS PROCEDURES RE	provide length of time given to in a fine, penalty, restitution, by affiliate, date paid and if any portion and to the entry of findings; E REVIEW OF THE ADEQUACY OF ITS ETECTING AND REPORTING SUSPICIOUS LL CERTIFY IN WRITING TO FINRA THAT PLACE POLICIES AND PROCEDURES TO A DESCRIPTION OF THE REVIEW AND AT ELATING TO COMPLIANCE WITH FINRA
	nust fit within the space provided).	. , ,		
		GENERAL INSTRU	ICTIONS	
his Di	isclosure Reporting Page (DRP ADV) is an 👩 IN			irmative responses to Items 11.C., 11.D
	11.F. or 11.G. of Form ADV.			
		Regulatory A	ction	
heck	item(s) being responded to:	<u> </u>		
11.0		□ 11.C(3)	☑ 11.C(4)	☑ 11.C(5)
<u> </u>		□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
🔲 11.E		□ 11.E(3)	□ 11.E(4)	
🔲 11.F	F.			

Use a separate DRP for each event or *proceeding*. The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File with a completed Execution Page.

sam	event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.
PAR	
Α.	The person(s) or entity(ies) for whom this DRP is being filed is (are): Output Output Description:
	C You and one or more of your advisory affiliates
	One or more of your advisory affiliates
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.
	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	T II
1.	
	© SEC Other Federal Ostate Oscillatory of Foreign (Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) UNITED STATES SECURITIES AND EXCHANGE COMMISSION
2.	Principal Sanction: Cease and Desist
	Other Sanctions:
	CENSURE, CIVIL AND ADMINISTRATIVE PENALTIES
3.	Date Initiated (MM/DD/YYYY):
	11/03/2014 © Exact C Explanation
	If not exact, provide explanation:
4.	Docket/Case Number:
	3-16232
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	
	Other Other Product Types:
	DEBT - MUNICIPAL
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") ALLEGED THAT IN MARCH 2014 CHARLES SCHWAB & CO., INC. ("SCHWAB") VIOLATED MSRB RULE G-15(F) BY EXECUTING FOUR UNSOLICITED SALES TRANSACTIONS IN PUERTO RICO GENERAL OBLIGATION BONDS OF 2014 SERIES A ("THE 2014 BONDS") WITH CUSTOMERS IN AMOUNTS BELOW THE \$100,000 MINIMUM DENOMINATION OF THE ISSUE ESTABLISHED BY THE ISSUER, PUERTO
	RICO, AND SPECIFIED IN THE OFFICIAL STATEMENT. THE COMMISSION ALSO ALLEGED THAT CHARLES SCHWAB & CO., INC. DID NOT HAVE ANY

POLICIES OR PROCEDURES CONCERNING MSRB RULE G-15(F). AS A RESULT OF THIS CONDUCT, THE COMMISSION ALLEGED THAT SCHWAB WILLFULLY

	SECTION 15(B)(C)(1) OF THE EXCHANGE ACT. T SCHWAB SUBMITTED AN OFFER OF SETTLEMEN' CONSENTED TO THE ENTRY OF AN ORDER INSTI (C)(2) AND 21C OF THE SECURITIES EXCHANGE ORDER.	T WHICH THE COMMISSION ACC TUTING ADMINISTRATIVE AND (EPTED AND, WITHOUT ADMIT CEASE-AND-DESIST PROCEEDI	TING OR DENYING THE FINDINGS, NGS PURSUANT TO SECTIONS 15(B), 15(B)			
8.	Current Status? C Pending C On Appe	eal © Final					
9.	If on appeal, regulatory action appealed to (SE	CC, <i>SRO</i> , Federal or State Court)	and Date Appeal Filed:				
lf F	inal or On Appeal, complete all items below. For	Pending Actions, complete Item	13 only.				
10.	Order						
11.	Resolution Date (MM/DD/YYYY):						
	11/03/2014 © Exact C Explanation						
	If not exact, provide explanation:						
12.	Resolution Detail:						
	A. Were any of the following Sanctions <i>Orde</i>	red (check all appropriate items))?				
	✓ Monetary/Fine Amount: \$ 61,800.00✓ Revocation/Expulsion/Denial	1	☐ Disgorgement/Restitution				
	✓ Censure		Disgorgement/RestitutionCease and Desist/Injunction	nn			
	☐ Bar		Suspension				
	B. Other Sanctions <i>Ordered:</i>		·				
	requalify/retrain, type of exam required a disgorgement or monetary compensation of penalty was waived: THE COMMISSION ORDERED THAT SCHWA OF SECTION 15B(C)(1) OF THE EXCHANGE THE ENTRY OF THE ORDER, WILL PAY A CI	, provide total amount, portion B CEASE AND DESIST FROM CON ACT AND MSRB RULE G-15(F).	levied against you or an <i>advis</i> MMITTING OR CAUSING ANY V SCHWAB WAS ALSO CENSURE	Sory affiliate, date paid and if any portion IOLATIONS AND ANY FUTURE VIOLATIONS D AND SCHWAB, WITHIN SEVEN DAYS OF			
13.	Provide a brief summary of details related to the must fit within the space provided). IN DETERMINING TO ACCEPT THE OFFER, THE COMADE AWARE BY COMMISSION STAFF THAT IT HOF THE ISSUE, SCHWAB CANCELLED THE TRAN WITH MSRB RULE G-15(F). SCHWAB WILL UNDER COMPLIANCE WITH MSRB RULE G-15(F). AFTER MSRB RULE G-15(F), INCLUDING ADOPTING NEWILL IMPLEMENT THESE POLICIES AND PROCEERULE G-15(F). SCHWAB WILL INFORM COMMISSION WITH THE ABOVE UNDERTAKINGS.	COMMISSION CONSIDERED REMINAD EFFECTED CUSTOMER TRAN SACTIONS. SCHWAB HAS ALSO ERTAKE TO REVIEW THE ADEQUA THAT REVIEW, SCHWAB WILL N W POLICIES AND PROCEDURES DURES, AND CONDUCT TRAININ	EDIAL ACTS PROMPTLY UNDER SACTIONS IN THE 2014 BOND AMENDED ITS POLICIES AND ACY OF ITS EXISTING POLICIEMAKE SUCH CHANGES AS ARE OR SUPPLEMENTING EXISTING AS TO THE POLICIES AND P	TAKEN BY SCHWAB. AFTER SCHWAB WAS S BELOW THE MINIMUM DENOMINATION PROCEDURES TO ENSURE COMPLIANCE S AND PROCEDURES RELATING TO NECESSARY TO EFFECT COMPLIANCE WITH G POLICIES AND PROCEDURES. SCHWAB ROCEDURES AND COMPLIANCE WITH MSRB			
This	Dicelecure Departing Dags (DDD ADV) is an - 1	GENERAL INSTRU		offirmative recogness to Itams 11.0. 11.0.			
	Disclosure Reporting Page (DRP ADV) is an I	NITIAL OR O AMENDED respon	se used to report details for a	arrirmative responses to Items II.C., II.D.			
		Regulatory Ac	tion				
	ck item(s) being responded to:	_	_	_			
	11.C(1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)			
	I1.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)			
	I1.E(1) ☐ 11.E(2)	□ 11.E(3)	□ 11.E(4)				
1	I1.F. □ 11.G.						
Use	a separate DRP for each event or <i>proceeding</i> . T	he same event or <i>proceeding</i> ma	ay be reported for more than	one <i>person</i> or entity using one DRP. File			

with a completed Execution Page.

VIOLATED MSRB RULE G -15(F) AND, THAT AS A RESULT OF SCHWAB'S WILLFUL VIOLATIONS OF MSRB RULE G-15(F), SCHWAB WILLFULLY VIOLATED

sam	event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the e event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.								
PAR									
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): • You (the advisory firm)								
	C You and one or more of your advisory affiliates								
	One or more of your advisory affiliates								
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.								
	ADV DRP - ADVISORY AFFILIATE								
	No Information Filed								
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.								
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.								
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:								
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.								
	O Yes O No								
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.								
PAR	T II								
1.	Regulatory Action initiated by: OSEC Other Federal State OSRO OF Foreign								
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) STATE OF MISSOURI - DEPARTMENT OF INSURANCE, FINANCIAL INSTITUTIONS AND PROFESSIONAL REGISTRATION.								
2.	Principal Sanction: Other								
	Other Sanctions:								
3.	Date Initiated (MM/DD/YYYY):								
	05/02/2014 © Exact C Explanation If not exact, provide explanation:								
4.	Docket/Case Number: 216865(E)								
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):								
6.	Principal Product Type: No Product Other Product Types:								
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): SCHWAB FAILED TO REPORT TO THE DIRECTOR THREE SEPARATE FINRA ADMINISTRATIVE ACTIONS AGAINST ITS BUSINESS ENTITY PRODUCER LICENSE IN ANOTHER JURISDICOIN WITHIN THIRTY DAYS OF THE FINAL DISPOSITION OF THE MATTER - AWC #20110289412-01; AWC #2011029074302 AND AWC #20100228149-01 IN VIOLATION OF SECTION 375.141.6, RSMO (SUPP. 2013)								
8.	Current Status? C Pending C On Appeal Final								

lf Fi	nal o	r On Appeal, complete all items below. For	Pending Actions, complete Iter	m 13 only.	
	How Othe	was matter resolved:			
11.	Resc	olution Date (MM/DD/YYYY):			
	06/0	05/2014 © Exact C Explanation			
		ot exact, provide explanation:			
10	Dage	dution Detail.			
12.	_	Dution Detail:			
	Α.	Were any of the following Sanctions <i>Orde</i>	red (check all appropriate item:	s)?	
		✓ Monetary/Fine Amount: \$ 750.00			
		Revocation/Expulsion/Denial		☐ Disgorgement/Restitution	
		Censure		☐ Cease and Desist/Injunction	
		☐ Bar		☐ Suspension	
	B.	Other Sanctions <i>Ordered:</i> N/A			
		Financial Operations Principal, etc.). If recrequalify/retrain, type of exam required a disgorgement or monetary compensation of penalty was waived: SEE ABOVE	nd whether condition has beer	satisfied. If disposition resulted	in a fine, penalty, restitution,
	mus CHA	ide a brief summary of details related to the tit within the space provided). RLES SCHWAB INSURANCE SERVICES ENTE NCIAL INSTITUTIONS AND PROFESSIONAL	RED INTO A VOLUNTARY FORFE		
		osure Reporting Page (DRP ADV) is an 🁩 I F. or 11.G. of Form ADV.	GENERAL INSTRU NITIAL OR O AMENDED respo		irmative responses to Items 11.C., 11.D
`hec	k itei	m(s) being responded to:	Regulatory A	ction	
	1.C(1		□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	1.D(1		□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
	1.E(1		□ 11.E(3)	□ 11.E(4)	L 11.D(3)
_ 1·		☐ 11.G.	L 11.L(3)	L 11.L(4)	
vith One	a cor	parate DRP for each event or <i>proceeding</i> . Templeted Execution Page. It may result in more than one affirmative and the second of the second	answer to Items 11.C., 11.D.,	11.E., 11.F. or 11.G. Use only on	e DRP to report details related to the
PART	I				
Α.		person(s) or entity(ies) for whom this DRP ou (the advisory firm)	is being filed is (are):		
	O Y	ou and one or more of your advisory affilia	tes		
	0 0	One or more of your advisory affiliates			
		is DRP is being filed for an <i>advisory affiliate</i> , e <i>advisory affiliate</i> has a <i>CRD</i> number, prov	•		
	ΑD\	DRP - ADVISORY AFFILIATE			
			No Informat	ion Filed	

9. If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:

	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR	
1.	Regulatory Action initiated by: OSEC Other Federal OState SRO OForeign
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FINRA
2.	Principal Sanction:
	Censure Other Sanations:
	Other Sanctions: A FINE OF \$2 MILLION.
3.	Date Initiated (MM/DD/YYYY):
	08/24/2015 © Exact C Explanation If not exact, provide explanation:
4.	Docket/Case Number: 20140428736
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):
6.	Principal Product Type:
	No Product Other Product Types:
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): FINRA FOUND THAT ON THREE DAYS IN 2014, AS A RESULT OF INTERCOMPANY TRANSFERS TO ITS PARENT CORPORATION, THE FIRM DID NOT MAINTAIN SUFFICIENT NET CAPITAL AND DID NOT HAVE ADEQUATE PROCEDURES IN PLACE TO ASSESS THE POTENTIAL NET CAPITAL IMPACT OF SUCH INTERCOMPANY TRANSFERS. THE TRANSFERS TO THE PARENT CORPORATION WERE MADE FOR RISK MITIGATION AND OVERNIGHT INVESTMENT PURPOSES, AND THE PARENT CORPORATION RETURNED THE TRANSFERRED FUNDS TO THE FIRM THE NEXT BUSINESS DAY. FINRA ALSO FOUND THE FIRM DID NOT CATEGORIZE AND CODE PROPRIETARY ACCOUNTS OF BROKER-DEALERS (PAB) IN ACCORDANCE WITH CERTAIN 2014 RULE CHANGES, RESULTING IN AN UNDERFUNDING OF THE PAB RESERVE ACCOUNT.
8.	Current Status? C Pending C On Appeal Final
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:
If F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.
10.	How was matter resolved: Acceptance, Waiver & Consent(AWC)
11.	Resolution Date (MM/DD/YYYY):
	08/24/2015 © Exact C Explanation
	If not exact, provide explanation:

12. Resolution Detail:

	A.	Were any of the fo	ollowing Sanctions <i>Orde</i>	ered (check all appropriate item	ns)?		
		☑ Monetary/Fine	Amount: \$ 2,000,000.	00			
		Revocation/Ex	pulsion/Denial		☐ Disgorgement/Restitution		
		☑ Censure			☐ Cease and Desist/Injunction		
		■ Bar			☐ Suspension		
	B.	Other Sanctions O)rdered:		'		
	Б.			r barred, provide duration inclu	uding start date and capacities aff	fected (General Securities Principal,	
		requalify/retrain, t disgorgement or n of penalty was wa	ype of exam required a nonetary compensation	and whether condition has been, provide total amount, portio	g was a condition of the sanction, n satisfied. If disposition resulted n levied against you or an <i>advisor</i>		
13.	mus THE FINE INTE	t fit within the spac FIRM IDENTIFIED A DINGS. THE FIRM PR	e provided). ND SELF-REPORTED TH ROMPTLY ADOPTED REM	E INTERCOMPANY TRANSFERS, IEDIAL MEASURES WHICH INCL	AND RESOLVED THIS MATTER WIT	s, conditions and dates (your response THOUT ADMITTING OR DENYING THE O ASSESS WHETHER CERTAIN NSURE THEY ARE PROPERLY CODED AND	
	KESI	ERVED.					
				GENERAL INSTR	PUCTIONS		
Γhis	Discl	osure Reporting Pag	ge (DRP ADV) is an 👩			firmative responses to Items 11.C., 11.D.	
		F. or 11.G. of Form		OR -			
				Regulatory /	Action		
		m(s) being respond		T 44 0(0)		1 44.0(5)	
	1.C(1		□ 11.C(2)	☐ 11.C(3)	□ 11.C(4)	11.C(5)	
	1.D(1		□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)	
	1.E(1)	☑ 11.E(2)	■ 11.E(3)	□ 11.E(4)		
□ 1	1.F.		□ 11.G.				
with One sam	a coi even e eve	mpleted Execution I	Page. e than one affirmative	answer to Items 11.C., 11.D.,		ne <i>person</i> or entity using one DRP. File e DRP to report details related to the arate DRP.	
PART		norsan(s) or antitu(ical for whom this DDD	is being filed is (are).			
Α.	⊙ Y	ou (the advisory fire					
	O Y	ou and one or more	e of your <i>advisory affilia</i>	ates			
		One or more of your					
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.						
	ADV DRP - ADVISORY AFFILIATE						
	No Information Filed						
	☐ This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. ☐ This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.						
	11.[D(4), and only if tha		than ten years ago. If you are	•	reported only in response to Item e SEC, you may remove a DRP for any	
		This DRP should be r circumstances:	removed from the ADV	record because it was filed in	error, such as due to a clerical or	data-entry mistake. Explain the	

B. If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to

	C Yes C No					
	NOTE: The completion of this form does not relieve the <i>advisory affiliate</i> of its obligation to update its IARD or <i>CRD</i> records.					
	NOTE. The completion of this form does not relieve the advisory anniate of its obligation to appear its TARD of CRD records.					
PAR	T II					
1.	Regulatory Action initiated by:					
	OSEC Other Federal OState OSRO OForeign					
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) CBOE EXCHANGE, INC.					
2.	Principal Sanction: Civil and Administrative Penalt(ies) /Fine(s) Other Sanctions: CENSURE					
3.	Date Initiated (MM/DD/YYYY):					
	07/02/2018 © Exact © Explanation If not exact, provide explanation:					
4.	Docket/Case Number: FILE NO. 18-0014 (STAR NO. 20150455238)					
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):					
6.	Principal Product Type:					
	Options Other Product Types					
	Other Product Types:					
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): CBOE EXCHANGE CLAIMED THAT, BETWEEN JANUARY 2010 THROUGH DECEMBER 2016, CHARLES SCHWAB & CO., INC. (CS&CO) INACCURATELY REPORTED LARGE OPTIONS POSTIONS REPORTING (LOPR) RECORDS, FAILED TO REPORT LOPR RECORDS, FAILED TO ESTABLISH ADEQUATE SUPERVISORY SYSTEMS REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH A CBOE RULE, AND FAILED TO REASONABLY SUPERVISE ITS LOPR REPORTING ACTIVITY.					
8.	Current Status? Pending On Appeal Final					
9.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:					
lf F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.					
10.	How was matter resolved: Consent					
11.	Resolution Date (MM/DD/YYYY):					
	08/30/2018 © Exact C Explanation					
	If not exact, provide explanation:					
12.	Resolution Detail:					
	A. Were any of the following Sanctions Ordered (check all appropriate items)?					
	Monetary/Fine Amount: \$ 300,000.00					
	Revocation/Expulsion/Denial Disgorgement/Restitution					
	✓ Censure Cease and Desist/Injunction					
	☐ Bar ☐ Suspension					
	B. Other Sanctions <i>Ordered</i> :					
	Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an advisory affiliate, date paid and if any portion					

of penalty was waived:

CS&CO WAS CENSURED AND FINED \$300,000.00. THE FINE WAS PAID ON SEPTEMBER 7, 2018.

the IARD or \it{CRD} for the event? If the answer is "Yes," no other information on this DRP must be provided.

13.	Provide a brief summary of details related to must fit within the space provided). WITHOUT ADMITTING OR DENYING THAT A VIOOF \$300,000.00.			
		CENEDAL INCEDIU	CTLONG	
Thic	Disclosure Poperting Page (DDP ADV) is an	GENERAL INSTRUC		firmative responses to Items 11 C 11 D
	Disclosure Reporting Page (DRP ADV) is an . In the contract of the contract o	OR C AMENDED TESPOIT	se used to report details for an	irmative responses to Items 11.C., 11.D.
	,	5		
Che	ck item(s) being responded to:	Regulatory Act	tion	
	11.C(1)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	11.D(1)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
	11.E(1) ☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
	11.F.			
One sam PAR	event may result in more than one affirmative the event. If an event gives rise to actions by multiple to the person(s) or entity(ies) for whom this DRI	ore than one regulator, provide d		·
	You (the advisory firm)			
	C You and one or more of your advisory affile	iates		
	One or more of your advisory affiliates			
	If this DRP is being filed for an advisory affiliate If the advisory affiliate has a CRD number, pro-	•		
		No Informatio	n Filed	
	☐ This DRP should be removed from the ADN This DRP should be removed from the ADN registered or applying for registration with adviser's or <i>advisory affiliate's</i> favor.	V record because: (1) the event or	proceeding occurred more that	n ten years ago or (2) the adviser is
	If you are registered or registering with a sta 11.D(4), and only if that event occurred more event listed in Item 11 that occurred more that	e than ten years ago. If you are re	•	
	☐ This DRP should be removed from the AD\ circumstances:	/ record because it was filed in err	ror, such as due to a clerical or	data-entry mistake. Explain the
B.	If the advisory affiliate is registered through the IARD or CRD for the event? If the answer	•	•	ed a DRP (with Form ADV, BD or U-4) to
	C Yes C No			
	NOTE: The completion of this form does not r	elieve the advisory affiliate of its o	bligation to update its IARD or	CRD records.
PAR	TII			
1.	Regulatory Action initiated by: OSEC Other Federal OState SRO	○ Foreign		
	(Full name of regulator, foreign financial regulation NASDAQ STOCK MARKET		SRO)	
2.	Principal Sanction:			
	Other Sanctions:			

3.	Date Initiated (MM/DD/YYYY):						
	05/26/2020 © Exact © Explanation If not exact, provide explanation:						
1.	Docket/Case Number: 2015044918101						
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):						
Ď.	Principal Product Type: No Product Other Product Types:						
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided):						
	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO MANAGE THE RISKS OF ITS MARKET ACCESS ACTIVITY AND TO PREVENT THE ENTRY OF ERRONEOUS ORDERS AND BY FAILING TO PRESERVE A WRITTEN DESCRIPTION OF ITS RISK MANAGEMENT CONTROLS. SPECIFICALLY, THE FIRM'S CONTROLS FOR ORDERS DIRECTLY ROUTED TO NASDAQ AND FOR ORDERS ROUTED TO OTHER BROKER-DEALERS WERE NOT REASONABLY DESIGNED TO PREVENT THE ENTRY OF ERRONEOUS ORDERS BECAUSE THEY WERE UNREASONABLY HIGH, FAILED TO REASONABLY TAKE INTO ACCOUNT THE TRADING CHARACTERISTICS OF UNDERLYING SECURITIES, AND FAILED TO REJECT ORDERS THAT WERE NOT REASONABLY RELATED TO THE QUOTED PRICES OF SECURITIES. THE FIRM FAILED TO ESTABLISH A SUPERVISORY SYSTEM AND WSPS REASONABLY DESIGNED TO ENSURE THAT ORDERS PLACED INTO TRADING SYSTEMS WERE NOT ENTERED IN ERROR OR IN A MANNER INCONSISTENT WITH NASDAQ RULES. THE FIRM FURTHER FAILED TO PRESERVE A WRITTEN DESCRIPTION OF ITS RISK MANAGEMENT CONTROLS IN ITS CURRENT RISK AND CREDIT SYSTEM AS PART OF ITS BOOKS AND RECORDS.						
3.	Current Status? C Pending C On Appeal C Final						
€.	If on appeal, regulatory action appealed to (SEC, SRO, Federal or State Court) and Date Appeal Filed:						
fF	inal or On Appeal, complete all items below. For Pending Actions, complete Item 13 only.						
10.	How was matter resolved:						
	Acceptance, Waiver & Consent(AWC)						
11.	Resolution Date (MM/DD/YYYY):						
	05/26/2020 © Exact C Explanation						
	If not exact, provide explanation:						
12.	Resolution Detail:						
	A. Were any of the following Sanctions <i>Ordered</i> (check all appropriate items)?						
	Monetary/Fine Amount: \$ 25,000.00						
	Revocation/Expulsion/Denial Disgorgement/Restitution						
	B. Other Sanctions <i>Ordered</i> :						
	UNDERTAKINGS Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion of penalty was waived: THE FIRM WAS CENSURED, FINED \$50,000, OF WHICH \$25,000 SHALL BE PAYABLE TO NASDAQ, REQUIRED TO IMPLEMENT RISK MANAGEMENT CONTROLS AND PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE RULES AND REGULATIONS CITED IN THE AWC AND REQUIRED TO REVISE ITS WSPS AND WRITTEN DESCRIPTION OF ITS RISK MANAGEMENT CONTROLS DESCRIBED IN THE AWC. OF THE \$50,000 FINE, \$25,000 SHALL BE PAYABLE TO NASDAQ AND \$25,000 SHALL BE PAYABLE TO NYSE ARCA, INC.						
13.	Provide a brief summary of details related to the action status and (or) disposition and include relevant terms, conditions and dates (your response must fit within the space provided).						

			Regulatory Acti	on		
Che	ck item(s) being responde	d to:				
\square 1	11.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)	
\square 1	11.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)	
\square 1	11.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)		
1	11.F.	□ 11.G.				
with	a completed Execution Pa	ge.			ne <i>person</i> or entity using one DRP. File e DRP to report details related to the	
	•		ore than one regulator, provide de	•	•	
PAR	TI					
A.	The <i>person(s)</i> or entity(ie You (the advisory firm		is being filed is (are):			
	O You and one or more	of your <i>advisory affilia</i>	ates			
	One or more of your					
	_	•	e, give the full name of the <i>advisor</i> vide that number. If not, indicate		s, Last name, First name, Middle name). the appropriate box.	
	ADV DRP - ADVISORY AFI	FILIATE				
			No Information	n Filed		
	☐ This DRP should be re registered or applying	P should be removed from the ADV record because the advisory affiliate(s) is no longer associated with the adviser. P should be removed from the ADV record because: (1) the event or proceeding occurred more than ten years ago or (2) the adviser is red or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the sor advisory affiliate's favor.				
	9	event occurred more	than ten years ago. If you are re		reported only in response to Item e SEC, you may remove a DRP for any	
	☐ This DRP should be re circumstances:	moved from the ADV	record because it was filed in erro	or, such as due to a clerical or	data-entry mistake. Explain the	
B.	•	•	e IARD system or <i>CRD</i> system, ha is "Yes," no other information on	•	ed a DRP (with Form ADV, BD or U-4) to	
	C Yes C No					
	NOTE: The completion of	this form does not re	elieve the <i>advisory affiliate</i> of its ob	ligation to update its IARD or o	CRD records.	
PAR ⁻	TII					
1.	Regulatory Action initiate SEC Other Federal	_	O Foreign			
	(Full name of regulator, for NYSE ARCA, INC.	oreign financial regula	tory authority, federal, state, or Si	RO)		
2.	Principal Sanction:					
	Other Sanctions:					
3.	Date Initiated (MM/DD/YY	,				
	05/24/2020	•				
	· · · · · · · · · · · · · · · · · · ·					
4.	Docket/Case Number: 2015044918102					
5.	Advisory Affiliate Employir	g Firm when activity	occurred which led to the regulator	ory action (if applicable):		

6. Principal Product Type:

7.	WITHOUT ADMITTI ESTABLISH A SYST MARKET ACCESS A MANAGEMENT CON BROKER-DEALERS FAILED TO REASON WERE NOT REASON REASONABLY DESI	ING OR DENYING THE FINDING FEM OF RISK MANAGEMENT CO ACTIVITY AND TO PREVENT TH NTROLS. SPECIFICALLY, THE F WERE NOT REASONABLY DES NABLY TAKE INTO ACCOUNT T NABLY RELATED TO THE QUOT	GS, THE FIRM CONSENTED TO ONTROLS AND SUPERVISORY FE ENTRY OF ERRONEOUS ORD IRM'S CONTROLS FOR ORDER HE TRADING CHARACTERISTIC FED PRICES OF SECURITIES. TERS PLACED INTO TRADING SYMILED TO PRESERVE A WRITTE	PROCEDURES REASONABLY DESI ERS AND BY FAILING TO PRESER S DIRECTLY ROUTED TO NYSE A RY OF ERRONEOUS ORDERS BEC CS OF UNDERLYING SECURITIES THE FIRM FAILED TO ESTABLISH YSTEMS WERE NOT ENTERED IN	ITRY OF FINDINGS THAT IT FAILED TO GNED TO MANAGE THE RISKS OF ITS RVE A WRITTEN DESCRIPTION OF ITS RISK RCA AND FOR ORDERS ROUTED TO OTHER AUSE THEY WERE UNREASONABLY HIGH, AND FAILED TO REJECT ORDERS THAT A SUPERVISORY SYSTEM AND WSPS ERROR OR IN A MANNER INCONSISTENT WAGEMENT CONTROLS IN ITS CURRENT
8.	Current Status?	C Pending C On Appe	eal © Final		
9.	If on appeal, regu	latory action appealed to (SE	C, <i>SRO</i> , Federal or State Coul	rt) and Date Appeal Filed:	
If Fi	inal or On Appeal, o	complete all items below. For	Pending Actions, complete Ite	em 13 only.	
10.	How was matter r	esolved:			
	Acceptance, Waive	er & Consent(AWC)			
11.	Resolution Date (M	MM/DD/YYYY):			
		xact C Explanation			
	If not exact, provi	·			
12.	Resolution Detail:				
	A. Were any of	the following Sanctions Order	red (check all appropriate iten	ns)?	
	Monetary	y/Fine Amount: \$ 25,000.00			
	Revocation	on/Expulsion/Denial		☐ Disgorgement/Restitution	
	☑ Censure			Cease and Desist/Injunction	on
	☐ Bar			Suspension	
	Financial Operequalify/retrology of penalty was the FIRM WAS CONTROLS A	GS ail: if suspended, enjoined or erations Principal, etc.). If requaling type of exam required and or monetary compensation, as waived: AS CENSURED, FINED \$50,000, ND PROCEDURES REASONABL	ualification by exam/retraining whether condition has been provide total amount, portion, OF WHICH \$25,000 IS PAYALY DESIGNED TO ACHIEVE COWRITTEN DESCRIPTION OF IT	g was a condition of the sanction satisfied. If disposition resulting levied against you or an advisuable TO NYSE ARCA, REQUIRED TO MPLIANCE WITH THE RULES AND	affected (General Securities Principal, n, provide length of time given to ed in a fine, penalty, restitution, sory affiliate, date paid and if any portion TO IMPLEMENT RISK MANAGEMENT D REGULATIONS CITED IN THE AWC AND S. THE REMAINING \$25,000 SHALL BE
13.	Provide a brief sur must fit within the	•	ne action status and (or) disp	osition and include relevant terr	ns, conditions and dates (your response
This	Disclosure Penortin	ng Page (DRP ADV) is an 💻 🖽	GENERAL INSTR		affirmative responses to Items 11.C., 11.D.,
	., 11.F. or 11.G. of		OR • AWENDED TESP	onse used to report details for t	animative responses to items 11.6., 11.6.,
			Regulatory A	Action	
	ck item(s) being re	•			
	1.C(1)	□ 11.C(2)	□ 11.C(3)	□ 11.C(4)	□ 11.C(5)
	1.D(1)	□ 11.D(2)	□ 11.D(3)	□ 11.D(4)	□ 11.D(5)
1	1.E(1)	☑ 11.E(2)	□ 11.E(3)	□ 11.E(4)	
□ 11.F. □ 11.G.					

Use a separate DRP for each event or *proceeding*. The same event or *proceeding* may be reported for more than one *person* or entity using one DRP. File

No Product

Other Product Types:

with	n a completed Execution Page.					
	e event may result in more than one affirmative answer to Items 11.C., 11.D., 11.E., 11.F. or 11.G. Use only one DRP to report details related to the ne event. If an event gives rise to actions by more than one regulator, provide details for each action on a separate DRP.					
PAR	et i					
A.	The person(s) or entity(ies) for whom this DRP is being filed is (are): You (the advisory firm)					
	O You and one or more of your advisory affiliates					
	One or more of your advisory affiliates					
	If this DRP is being filed for an <i>advisory affiliate</i> , give the full name of the <i>advisory affiliate</i> below (for individuals, Last name, First name, Middle name). If the <i>advisory affiliate</i> has a <i>CRD</i> number, provide that number. If not, indicate "non-registered" by checking the appropriate box.					
	ADV DRP - ADVISORY AFFILIATE					
	No Information Filed					
PART A. B. PART 1. 2.	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.					
	If you are registered or registering with a state securities authority, you may remove a DRP for an event you reported only in response to Item 11.D(4), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.					
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:					
B.	If the advisory affiliate is registered through the IARD system or CRD system, has the advisory affiliate submitted a DRP (with Form ADV, BD or U-4) to the IARD or CRD for the event? If the answer is "Yes," no other information on this DRP must be provided.					
	C Yes C No					
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.					
PAR	TTII					
1.	Regulatory Action initiated by: OSEC Other Federal OState SRO OForeign					
	(Full name of regulator, foreign financial regulatory authority, federal, state, or SRO) FINRA					
2.	Principal Sanction: Censure					
	Other Sanctions:					
3.	Date Initiated (MM/DD/YYYY):					
	06/08/2023 © Exact © Explanation If not exact, provide explanation:					
4.	Docket/Case Number: 2020068047101					
5.	Advisory Affiliate Employing Firm when activity occurred which led to the regulatory action (if applicable):					
6.	Principal Product Type: Other Other Product Types: EXCHANGE TRADED NOTES (ETNS)					
7.	Describe the allegations related to this regulatory action (your response must fit within the space provided): WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT BETWEEN JANUARY 2016 AND DECEMBER 2020 IT SENT TO ITS CUSTOMERS TRANSACTION CONFIRMATIONS THAT OMITTED REQUIRED DISCLOSURES REGARDING PURCHASES OF CERTAIN ETNS. THE FINDINGS STATE THAT THE CONFIRMATIONS FAILED TO DISCLOSE THAT THE ETNS WERE CALLABLE AND THAT EARLY REDEMPTION COULD AFFECT THE ETNS' YIELD. THE FINDINGS ALSO STATE THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE RULES					

	REGARDING TRANSACTI	ON CONFIRMATIONS FO	R CALLABLE ETNS.		
8.	Current Status?	Pending C On Appe	eal © Final		
9.	If on appeal, regulatory	action appealed to (SE	C, <i>SRO</i> , Federal or State Co	ourt) and Date Appeal Filed:	
If Fi	inal or On Appeal, comple	ete all items below. For	Pending Actions, complete	tem 13 only.	
10.	How was matter resolve Acceptance, Waiver & C				
11.	Resolution Date (MM/DD	/YYYY):			
	06/08/2023 © Exact	C Explanation			
	If not exact, provide exp	olanation:			
12.	Resolution Detail:				
	A. Were any of the fo	llowing Sanctions <i>Order</i>	red (check all appropriate ite	ems)?	
	Monetary/Fine	Amount: \$ 350,000.00			
	Revocation/Ex	pulsion/Denial		☐ Disgorgement/Restitution	
	☑ Censure			Cease and Desist/Injunct	ion
	☐ Bar			☐ Suspension	
	B. Other Sanctions O	rdered:			
13.	of penalty was was THE FIRM WAS CEN Provide a brief summary must fit within the space	ived: NSURED AND FINED \$35 y of details related to the provided).	0,000. PAYMENT WAS MADE	BY THE FIRM ON X07/05/2023. Sposition and include relevant ter	rms, conditions and dates (your response
CIVI	L JUDICIAL ACTION DI	SCLOSURE REPORTIN	G PAGE (ADV)		
			GENERAL INS	TRUCTIONS	
	Disclosure Reporting Pag or Item 2.F. of Part 1B of F		NITIAL <i>OR</i> © AMENDED res	sponse used to report details for	affirmative responses to Item 11.H. of Part
			Civil Ju	dicial	
Chec	ck Part 1A item(s) being	responded to:			
 1	1.H(1)(a)	□ 11.H(1)	(b)	☑ 11.H(1)(c)	□ 11.H(2)
Chec	ck Part 1B item(s) being	responded to:			
	2.F(1)	□ 2.F(2)	□ 2.F(3)	□ 2.F(4)	2.F(5)
	a separate DRP for each a completed Execution F	· · · · · · · · · · · · · · · · · · ·	he same event or <i>proceedin</i>	g may be reported for more than	one <i>person</i> or entity using one DRP. File
	•		inswer to Item 11.H. of Par reported on separate DRPs		only one DRP to report details related to the
PART	ТІ				
A.	The <i>person(s)</i> or entity(i		is being filed is (are):		
	~	e of your advisory affiliat	tos		
			es es		
	One or more of your	advisory affiliates			
	If this DRP is being filed	for an advisory affiliate.	give the full name of the au	dvisory affiliate below (for individu	ials, Last name, First name, Middle name).

ART 1. 2. 3. 4. 5. 9.	ADV DRP - ADVISORY AFFILIATE
	No Information Filed
	This DRP should be removed from the ADV record because the <i>advisory affiliate(s)</i> is no longer associated with the adviser. This DRP should be removed from the ADV record because: (1) the event or <i>proceeding</i> occurred more than ten years ago or (2) the adviser is registered or applying for registration with the SEC or reporting as an <i>exempt reporting adviser</i> with the SEC and the event was resolved in the adviser's or <i>advisory affiliate's</i> favor.
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.H (1)(a), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
В.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP must be provided.
	C Yes C No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
ART	
1.	Court Action initiated by: (Name of regulator, <i>foreign financial regulatory authority, SRO</i> , commodities exchange, agency, firm, private plaintiff, etc.) ATTORNEY GENERAL ANDREW M. CUOMO, THE STATE OF NY
2.	Principal Relief Sought: Restitution Other Relief Sought: DISGORGEMENT OF GAINS, PAY DAMAGES, PAY PENALITIES AND COSTS, INJUNCTIVE RELIEF.
3.	Filing Date of Court Action (MM/DD/YYYY):
	08/17/2009 © Exact C Explanation If not exact, provide explanation:
4.	Principal Product Type:
	Other Other Product Types:
	AUCTION RATE SECURITIES
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County <u>and</u> State or Country, Docket/Case Number): SUPREME COURT OF THE STATE OF NEW YORK
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable): CHARLES SCHWAB & CO., INC.
7.	Describe the allegations related to this civil action (your response must fit within the space provided): THE COMPLAINT ALLEGES FRAUD IN CONNECTION WITH THE SALE OF AUCTION RATE SECURITIES.
3.	Current Status? C Pending C On Appeal G Final
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY):
	© Exact © Explanation
	If not exact, provide explanation:
lf Fi	nal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.
11.	How was matter resolved:

If the advisory affiliate has a CRD number, provide that number. If not, indicate "non-registered" by checking the appropriate box.

12.	Resolution	Date (MINI/DD/1111).			
		5 © Exact © Explanation t, provide explanation:			
13.	Resolution	Detail:			
	A. Were	any of the following Sanctions Ordered	or Relief Granted(check	appropriate items)?	
		onetary/Fine Amount: \$	•	,	
		evocation/Expulsion/Denial		☐ Disgorgement/Restitution	
		ensure		☐ Cease and Desist/Injunction	2.00
					on
	🗖 Ва			Suspension	
	B. Other	Sanctions:			
	UNDE	RTAKING.			
	Finan- requa disgo of per	nalty was waived:	ification by exam/retrain whether condition has be rovide total amount, por	ing was a condition of the sanctic een satisfied. If disposition result tion levied against you or an adva	on, provide length of time given to
		RITIES ("ARS") CLAIMS AGAINST SCHWA SCHWAB AGREEING TO CERTAIN UNDER			PREJUDICE OF THE NYAG'S LAWSUIT,
		orief summary of circumstances related ne space provided).	to the action(s), allegati	on(s), disposition(s) and/or findir	ng(s) disclosed above (your response must
:	THE NEW YORK ATTORNEY GENERAL ("NYAG") ASSERTS THAT SCHWAB FAILED TO DISCLOSE OR MISREPRESENTED INHERENT LIQUIDITY RISKS IN THE SALE OF CERTAIN AUCTION RATE SECURITIES. THE NYAG'S COMPLAINT AGAINST SCHWAB ALLEGED FOUR CAUSES OF ACTION: (1) VIOLATION OF SECTION 63(12) OF NEW YORK'S EXECUTIVE LAW; (2) VIOLATION OF THE GENERAL BUSINESS LAW ("GBL") 352-C(1)(A); (3) VIOLATION OF GBL 352-C(1)(C); AND (4) VIOLATION OF GBL 349. ON OCTOBER 24TH, 2011 THE TRIAL COURT DISMISSED THE NYAG'S COMPLAINT AGAINST SCHWAB IN ITS ENTIRETY FOR FAILURE TO STATE A CAUSE OF ACTION. AUGUST 27, 2013 THE APPELLATE COURT AFFIRMED DISMISSAL OF THE FIRST AND FOURTH COUNTS, AND LIMITED THE TWO REMAINING GBL 352 CLAIMS TO ARS PURCHASES BEFORE SEPTEMBER 5, 2007. THE NYAG AND SCHWAB THEN FILED CROSS MOTIONS FOR SUMMARY JUDGMENT OF THE REMAINING CLAIMS. THE CASE WAS SETTLED BEFORE THOSE MOTIONS WERE DECIDED.				
		Reporting Page (DRP ADV) is an C INIT of Part 1B of Form ADV.	GENERAL INS TIAL OR ⊙ AMENDED res		affirmative responses to Item 11.H. of Part
			Civil Ju	dicial	
		em(s) being responded to:			_
☑ 11	1.H(1)(a)	☑ 11.H(1)(b)		□ 11.H(1)(c)	□ 11.H(2)
Check	k Part 1B it	rem(s) being responded to:			
2 .1		□ 2.F(2)	□ 2.F(3)	2 .F(4)	□ 2.F(5)
L Z.	1 (1)	L 2.1 (2)	L 2.1 (3)	L 2.1 (4)	L 2.1 (3)
	•	DRP for each event or <i>proceeding</i> . The d Execution Page.	same event or <i>proceedin</i>	g may be reported for more than	one <i>person</i> or entity using one DRP. File
	•	result in more than one affirmative ansv related civil judicial actions must be rep			only one DRP to report details related to the
PART					
		n(s) or entity(ies) for whom this DRP is b	eing filed is (are):		
		e advisory firm)			
	O You and	d one or more of your advisory affiliates			
	O One or	more of your advisory affiliates			
		is being filed for an <i>advisory affiliate</i> , giv sory affiliate has a CRD number, provide		·	als, Last name, First name, Middle name). g the appropriate box.
	ADV DRP -	ADVISORY AFFILIATE			
			No Inforr	nation Filed	
	☐ This DR☐ This DR	P should be removed from the ADV rece P should be removed from the ADV rece	ord because the <i>advisory</i> ord because: (1) the eve	affiliate(s) is no longer associated nt or proceeding occurred more the	d with the adviser. Ian ten years ago or (2) the adviser is

	registered or applying for registration with the SEC or reporting as an exempt reporting adviser with the SEC and the event was resolved in the adviser's or advisory affiliate's favor.
	If you are registered or registering with a <i>state securities authority</i> , you may remove a DRP for an event you reported only in response to Item 11.H. (1)(a), and only if that event occurred more than ten years ago. If you are registered or registering with the SEC, you may remove a DRP for any event listed in Item 11 that occurred more than ten years ago.
	This DRP should be removed from the ADV record because it was filed in error, such as due to a clerical or data-entry mistake. Explain the circumstances:
B.	If the <i>advisory affiliate</i> is registered through the IARD system or <i>CRD</i> system, has the <i>advisory affiliate</i> submitted a DRP (with Form ADV, BD or U-4) to the IARD or <i>CRD</i> for the event? If the answer is "Yes," no other information on this DRP must be provided.
	O Yes O No
	NOTE: The completion of this form does not relieve the advisory affiliate of its obligation to update its IARD or CRD records.
PAR [*]	
1.	Court Action initiated by: (Name of regulator, foreign financial regulatory authority, SRO, commodities exchange, agency, firm, private plaintiff, etc.) U.S. SECURITIES AND EXCHANGE COMMISSION
2.	Principal Relief Sought:
	Injunction Other Relief Sought: CIVIL PENALTY(IES)/FINE(S)
3.	Filing Date of Court Action (MM/DD/YYYY):
	07/02/2018 © Exact C Explanation If not exact, provide explanation:
4.	Principal Product Type: No Product Other Product Types:
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case
	Number): UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA: SAN FRANCISCO, CALIFORNIA; 4:18-CV-03942
6.	Advisory Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action (your response must fit within the space provided): PURSUANT TO A CONSENT EXECUTED BY CHARLES SCHWAB & CO., INC. (CS&CO.) AND FILED WITH THE FEDERAL DISTRICT COURT ON JULY 9, 2018, CS&CO. CONSENTED TO THE ENTRY OF AN INJUNCTION REGARDING CS&CO.'S ALLEGED FAILURE TO FILE SUSPICIOUS ACTIVITY REPORTS (SARS) ON SUSPICIOUS TRANSACTIONS BY INDEPENDENT, THIRD PARTY INVESTMENT ADVISERS (ADVISERS) THAT CS&CO. TERMINATED FROM ITS CUSTODIAL PLATFORM IN VIOLATION OF SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 (EXCHANGE ACT) AND RULE 17A-8 PROMULGTED THEREUNDER. THE ADVISORS WERE NOT AFFILIATED OR ASSOCIATED WITH CS&CO. IN ANY WAY. CS&CO. TERMINATED THE ADVISERS FOR ENGAGING IN ACTIVITY THAT CS&CO. DETERMINED HAD VIOLATED ITS INTERNAL POLICIES OR PRESENTED RISK TO THE FIRM AND ITS CUSTOMERS.
8.	Current Status? C Pending C On Appeal C Final
9.	If on appeal, action appealed to (provide name of court) and Date Appeal Filed (MM/DD/YYYY):
10.	If pending, date notice/process was served (MM/DD/YYYY):
	C Exact C Explanation If not exact, provide explanation:
lf F	inal or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.
11.	How was matter resolved: Consent
12.	Resolution Date (MM/DD/YYYY):
	07/09/2018 © Exact © Explanation If not exact, provide explanation:
13.	Resolution Detail:

	A.	Were any of the following Sanctions Ordered or Relief Granted(check a	ppropriate items)?
		Monetary/Fine Amount: \$ 2,800,000.00	
		Revocation/Expulsion/Denial	☐ Disgorgement/Restitution
		☐ Censure	☑ Cease and Desist/Injunction
		□ Bar	Suspension
	B.	Other Sanctions:	
		RESTRAINED; UNDERTAKINGS	
	C.	C. Sanction detail: if suspended, <i>enjoined</i> or barred, provide duration including start date and capacities affected (General Securities Principal Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement, or monetary compensation, provide total amount, portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> , date paid and if any portion levied against you or an <i>advisory affiliate</i> .	
		THE CIVIL PENALTY WAS PAID ON 07/23/2018	
		vide a brief summary of circumstances related to the action(s), allegation vithin the space provided).	n(s), disposition(s) and/or finding(s) disclosed above (your response must
	WITI	HOUT ADMITTING OR DENYING THE ALLEGATIONS, CS&CO. CONSENTED	TO (I) THE ENTRY OF A PERMANENT INJUNCTION FROM VIOLATING SECTION
	17(A	A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER, AND (II) PAY A	CIVIL PENALTY IN THE AMOUNT OF \$2,800,000.00
rt 2	2		
ver	mntic	on from brochure delivery requirements for SEC-registered advisers	

art 2				
Exemption from brochure delivery requirements for SEC-registered advisers				
SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering brochure to all of your advisory clients, you do not have to prepare a brochure.	а			
	Yes	No		
Are you exempt from delivering a brochure to all of your clients under these rules?	0	\odot		
If no, complete the ADV Part 2 filing below.				
Amend, retire or file new brochures:				

Part 3 CRS Type(s) Affiliate Info Retire Dual Dual

Execution Pages

DOMESTIC INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:
MARY ROSAI
Printed Name:
MARY ROSAI
Adviser *CRD* Number:

5393

Date: MM/DD/YYYY 10/06/2023

Title:

MANAGING DIRECTOR

NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

1. Appointment of Agent for Service of Process

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such persons may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

2. Appointment and Consent: Effect on Partnerships

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

3. Non-Resident Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature: Date: MM/DD/YYYY

Printed Name: Title:

Adviser CRD Number:

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